

The Golden Thread Alliance

Whistleblowing Policy

Date Reviewed	<i>Autumn 2025</i>
Next Review Date	<i>Autumn 2026</i>

This policy has been adopted by all schools within The Golden Thread Alliance



As united as we are different.

Table of Contents

1. Honesty and Integrity.....	2
2. Aims.....	2
3. Colleagues.....	2
4. Whistleblowing Trustee and Whistleblowing Officer.....	2
Wrongdoing at work.....	3
Safeguarding.....	3
Confidentiality.....	4
Stage One.....	5
Stage Two.....	5
Stage Three.....	5
Relevant External Reporting.....	5
29. Queries.....	7

1. Honesty and Integrity: The Trust is committed to conducting its business with honesty and integrity, and we expect all colleagues to maintain high standards in accordance with the Code of Conduct. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

2. Aims: The aims of this policy are to:

- 2.1 encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- 2.2 provide colleagues with guidance as to how to raise those concerns; and
- 2.3 reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

3. Colleagues: This policy covers all colleagues, officers, governors, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

4. Whistleblowing Trustee and Whistleblowing Officer: The Whistleblowing Officer is detailed at paragraph 18. The Whistleblowing Trustee would be the Chair of the Board of

Trustees.

Wrongdoing at work

- 5. Whistleblowing:** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- 5.1 criminal activity;
 - 5.2 safeguarding concerns (see paragraph 10 below);
 - 5.3 failure to comply with any legal or professional obligation or regulatory requirements;
 - 5.4 miscarriages of justice;
 - 5.5 danger to health and safety;
 - 5.6 damage to the environment;
 - 5.7 bribery;
 - 5.8 financial fraud or mismanagement;
 - 5.9 other unlawful or unethical conduct in the workplace;
 - 5.10 the deliberate concealment of any of the above matters.
- 6. Whistleblower:** A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities and such disclosure is in the public interest (**whistleblowing concern**) you should report it under this policy.
- 7. Grievances:** This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure contained in the People Manual should be used in such cases.
- 8. Detriment:** Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing.
- 9. Advice:** If you are uncertain whether something is within the scope of this policy you should seek advice from the Headteacher, Chief Executive Officer, Chair of the Board of Trustees, Designated Safeguarding Lead, Protect, the NSPCC whistleblowing helpline or the Modern Slavery helpline.

Safeguarding

- 10. Safeguarding:** Nothing within this policy is intended to prevent colleagues from complying with their statutory obligations in accordance with *Keeping children safe in education* (DfE, September 202). In particular:

As united as we are different.

- 11. Child Protection and Safeguarding Policy:** If you have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. See the Trust's Child Protection and Safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the Designated Safeguarding Lead is not available.
- 12. Safeguarding – colleagues:** You must raise any concerns about another colleague (even if they are low level concerns) in accordance with the raising allegations and low-level concerns.
- 13. Whistleblowing Policy:** You should follow this procedure to raise concerns about poor or unsafe practices at the school or Trust or potential failures by the school, Trust or colleagues to properly fulfil its safeguarding responsibilities.
- 14. The Modern Slavery Helpline:** The Trust is committed to the prevention of modern slavery. If you have any queries relating to modern slavery, please contact the Chief Operating Officer or refer to the Trust website. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700.
- 15. Exit Interviews:** All colleagues are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of colleagues or other matters, during the course of their employment in accordance with this policy. Safeguarding children is at the centre of the Trust's culture and concerns should always be raised in accordance with paragraph 10 above. If issues have not been identified before, safeguarding will always be considered formally during colleagues performance development conversations and appraisal and finally at exit interviews which are held with all leavers. Colleagues who raise concerns about working practices at the school or Trust to a Designated Safeguarding Lead or an appropriate senior colleague will be protected from detriment under this policy.

Confidentiality

- 16. Confidentiality:** We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone

investigating your concern to know your identity, we will discuss this with you.

- 17. Anonymous Disclosures:** We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Stage One

- 18. Procedure:** Concerns regarding school based colleagues should be reported to the Headteacher. Concerns regarding the Headteacher should be reported to the Director of Education. Concerns regarding Central Team colleagues such as People or Finance team should be reported to the Chief Operating Officer. Concerns regarding senior Central colleagues, such as Chief Operating Officer, Director of Education, should be reported to the Chief Executive Officer. Concerns regarding the Chief Executive Officer should be reported to the Chair of the Board of Trustees.

- 19. Response:** You can expect a response detailing from whom the disclosure has been notified to within five working days of the appropriate person becoming aware of the disclosure. The colleague who raised the concern will be informed of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Stage Two

- 20. Procedure:** If no response is forthcoming after five working days or if you are not satisfied with the way in which your concern has been handled you should notify the Whistleblowing Officer.

- 21. Response:** You can expect a response detailing any action taken within five working of the Whistleblowing Officer becoming aware of the disclosure.

Stage Three

- 22. Procedure:** If no such response is forthcoming after five working days from the Whistleblowing Officer, if you are not satisfied with the way in which your concern has been handled or if the Whistleblowing Officer is involved in the suspected wrongdoing you should inform the Whistleblowing Trustee of the disclosure.

Relevant External Reporting



As united as we are different.

23. Outside Committee: The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises, as does paragraph 10 above, that in some circumstances it may be appropriate for you to report your concerns to a relevant outside Committee including:

- 23.1 the local authority's Designated Officer;
- 23.2 Children's Social Care;
- 23.3 the NSPCC;
- 23.4 the Health and Safety Executive;
- 23.5 the Environment Agency;
- 23.6 the Information Commissioner;
- 23.7 the Department for Education, where referrals can be made at www.gov.uk/contact-dfe;
- 23.8 the Department for Business, Energy and Industrial Strategy;
- 23.9 the Police;
- 23.10 the Charity Commission;
- 23.11 the Boarding Schools Association;
- 23.12 the Office for Standards in Education, Children's Services and Skills (**Ofsted**); or
- 23.13 the Channel Police Practitioner.

24. Advice: Colleagues are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

25. Protect: If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. Colleagues can call 020 3117 2520 for advice.

26. NSPCC: The NSPCC whistleblowing helpline is available for colleagues who do not feel able to raise concerns regarding child protection failures internally. Colleagues can call 0808 800 5000 (8.00 am to 10.00 pm Monday to Friday) or email help@nspcc.org.uk.

27. The Modern Slavery Helpline: The Modern Slavery helpline is available for colleagues who do not feel able to raise concerns about modern slavery internally. Colleagues can call on 0800 0121 700.

28. The Media: Under no circumstances should you approach a commercial Committee or the media with details of the suspected wrongdoing. If you approach any such Committee and/or where your concern is disclosed in a malicious manner or for

personal gain, the protection given to you by this procedure may be lost. Additionally, the Trust may consider this to be gross misconduct and disciplinary action may be taken against you.

29. Queries: If you have any queries about this procedure, you should contact the Whistleblowing Officer.



West Hill Primary Academy
Dartford Road,
Dartford, Kent,
DA1 3DZ



01322 296140



hello@golden-thread.org



As united as we are different.