

# **WHISTLEBLOWING**

**POLICY TO BE REVIEWED EVERY YEAR OR EARLIER DUE TO  
ANY LEGISLATIVE CHANGES**

**FOR ALL ACADEMIES PART OF ST GABRIEL THE ARCHANGEL  
CATHOLIC MULTI-ACADEMY TRUST**

Approved by Board of Directors: 18th September 2025

Next Review: October 2025

## Introduction

'Whistleblowing' is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice, or wrongdoing which affects others. It is referred to in law as "making a protected disclosure." It has a specific legal definition under the Public Interest Disclosure Act 1998 ("PIDA"), i.e., "a disclosure of information which, in the reasonable belief of the worker, is made in the public interest and tends to show serious misconduct." The policy is based on the **Public Interest Disclosure Act 1998 (PIDA)** and is aligned with [government guidance on whistleblowing](#). This addresses the recommendation to reference government guidance.

This malpractice may constitute any behaviour detrimental to the best interests of the St Gabriel the Archangel Catholic Multi-Academy Trust (SGtA CMAT), its stakeholders, and its employees. Specific examples of issues covered by the Whistleblowing Policy include:

- Any unlawful act
- Health and safety issues
- Damage to the environment
- Unauthorised use of public funds
- Fraud, corruption, and wrongdoing of any description
- Inappropriate or improper conduct (including bullying, bribery, or harassment)
- Serious failure to comply with appropriate professional standards
- Breach of the SGtA CMAT's Constitution or other policy or Code of practice
- Discrimination of any kind
- Negligence
- Any form of unethical conduct
- The deliberate concealment of any of the above matters

The SGtA CMAT's Whistleblowing Policy does not apply to raising grievances about an employee's personal situation. Any such concerns should be raised under the existing provisions for raising grievances.

Provided that you act in good faith and have a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur, you can disclose your concerns using this procedure and be protected by law from victimisation or dismissal. To be protected under PIDA, a worker only has to have a reasonable belief that the wrongdoing being complained about is being, has been, or is likely to be committed.

Although not strictly required by the Act, the SGtA CMAT's internal procedures give effect to it. The SGtA CMAT believes that having internal procedures is in everyone's interest.

## Aims of the Policy

The aims of this Policy are to provide an internal mechanism for reporting, investigating, and remedying any wrongdoings within our SGtA CMAT. With this in mind, the Board of Directors is hopeful that workers and/or members of the public will raise matters internally rather than alerting external bodies or contacts. However, if a worker has good reason to believe that a) their disclosure will not be managed properly by St Gabriel the Archangel Catholic Multi-Academy Trust or b) that they will be exposed to victimisation or any other detriment as a result of making the disclosure internally, they may contact external bodies directly. Contact details are at the end of this document.

- Encourage employees to feel confident about raising concerns and to question and act on those concerns.
- Provide ways for employees to raise concerns and receive feedback on any action taken as a result.
- Reassure employees that if they raise concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.
- Ensure that employees are aware of the options available to them if they are dissatisfied with the SGtA CMAT's initial response.

## **Who is covered by the Policy?**

The SGtA CMAT's Whistleblowing Policy applies equally to all of the following groups:

- All employees (including part-time, temporary, and volunteer staff)
- Agency staff working for the SGtA CMAT
- Contractors and suppliers
- Organisations working with the SGtA CMAT under partnership arrangements
- Service users and stakeholders

## **What assurance does the Whistleblowing Policy provide?**

Individuals raising concerns under the Whistleblowing Policy will not be at risk of any form of retribution or sanction, including losing their job or contract with the SGtA CMAT, provided that:

1. The disclosure is made in good faith
2. There is a genuine and reasonable belief that the information, and any allegations contained in it, is substantially true
3. The disclosure is not motivated by personal gain

The SGtA CMAT will not tolerate harassment or victimisation of anyone raising a genuine concern. However, where matters which are known to be untrue are raised maliciously, it is likely that disciplinary action will be taken against the person.

## **Distinguishing Whistleblowing from Other Concerns**

Not all concerns raised by staff will fall under the scope of whistleblowing. A whistleblowing concern relates to suspected wrongdoing or dangers at work that are in the public interest, such as:

- Criminal offences;
- Failure to comply with a legal obligation;
- Miscarriage of justice;
- Endangerment of the health and safety of an individual;
- Damage to the environment;
- Deliberate concealment of wrongdoing.

Concerns that relate to personal circumstances, such as dissatisfaction with an individual's own employment position, are usually dealt with under the **Grievance Policy**. Complaints about services or decisions may be dealt with under the **Complaints Policy**, and concerns relating to the safety or welfare of children or vulnerable people should be raised under the **Child Protection/Safeguarding Policies**.

For further guidance on the distinction between whistleblowing and grievances, staff are encouraged to consult Protect (formerly Public Concern at Work):  
<https://protect-advice.org.uk/what-is-whistleblowing/>

## **Making a Disclosure/Raising a Concern**

The SGtA CMAT has established the following primary mechanisms for employees to report their concerns:

### **1. Initial Reporting:**

If an employee reasonably believes they have discovered serious malpractice within the workplace, they should raise these concerns with their line manager, who will then escalate the matter to the Principal.

Concerns may be raised verbally or in writing, although staff are encouraged to make reports in writing wherever possible. Written reports should include:

- The names of those alleged to be involved in the wrongdoing;
- Dates, times and places relevant to the concern;
- Any available evidence or supporting context;
- Whether the individual has any personal interest in the matter.

Concerns should be raised as soon as possible to allow timely investigation.

### **2. Escalation Process:**

- If reporting to the line manager is not possible or appropriate, the employee should contact the Principal directly.
- If the Principal is suspected of involvement, the concern should be raised with the Catholic Senior Executive Leader (CSEL) or the Chair of the Governing Body.
- If the CSEL or a senior member of the central team is suspected, the concern should be raised with the CEO
- In cases where the CEO or Chair of the Governing Body or Regional Governors may be involved, the employee should contact the Chair of the Board of Directors.
- Should there be a suspicion of involvement by the Board of Directors, the Director of Schools at the Birmingham Diocesan Education Service should be contacted.

### **3. Investigation Process:**

- Upon receiving a concern, the appropriate investigating officer will be assigned based on the nature of the concern and the individuals involved.

- The investigating officer will arrange a meeting with the whistleblower to discuss the concern in detail.
- All concerns can be raised verbally or in writing.

#### 4. **Anonymous Reporting:**

- While anonymous allegations will be considered, it is much more challenging to investigate them fully. The Whistleblowing Policy is designed to protect staff raising genuinely held concerns, and individuals utilising the provisions of the policy are encouraged to identify themselves. Feedback relating to any investigation can only be provided where contact details are known.

### **Confidentiality**

All concerns will be treated in confidence, and every effort will be made not to reveal an employee's identity if they so wish. At the appropriate time, however, the employee may need to come forward as a witness. Employees reporting concerns also have a duty to observe this confidentiality.

### **How will the SGtA CMAT respond?**

The SGtA CMAT's response will depend on the nature of the concern that has been raised. In all instances, the SGtA CMAT will:

- Record and acknowledge the issue raised and refer it for investigation within three days of receiving the information or sooner, depending on the nature of the concern and its potential impact.
- Respect confidentiality – The SGtA CMAT will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated, however, that this is not always possible. The investigation process may reveal the source of the information, and a statement by you may be required as part of the evidence. The person investigating the matter will be informed of any confidentiality requirements relating to the disclosure.
- Decide on appropriate action e.g. Audit Services investigation, other internal investigation, referral to the police, or other external organisation.
- Subject to any legal constraints, the relevant employee will normally be informed of the final outcome of any investigation undertaken.

At the conclusion of an investigation (whether initial or further), a written report will be prepared setting out:

- Findings of fact;
- Whether wrongdoing has occurred;
- Recommendations for corrective action;
- Whether referral to an external organisation (such as the police or local authority) is required.

The Trust will also review relevant policies, procedures and practices in light of the concern, documenting any lessons learned and identifying changes required to reduce the risk of recurrence.

## **How can a concern be taken further?**

If employees remain dissatisfied with the SGtA CMAT's response, they may contact the following organisations for advice:

**1. Protect (formerly Public Concern at Work):**

- Address: Suite 301, 16 Baldwin Gardens, London EC1N 7RJ
- Tel: 020 3117 2520
- Email: whistle@protect-advice.org.uk

**2. NSPCC Whistleblowing Advice Line:**

- Tel: 0800 028 0285
- Email: help@nspcc.org.uk

**3. Confidential Public Interest Disclosure Line:**

- Tel: 0845 052 2646

In addition, individuals have the option of taking advice from their trade union, the Citizens Advice Bureau, their own legal representation, etc.

### **Contact Office**

Accounting Officer/CEO

Miss Toni Ellis

St Gabriel the Archangel Catholic Multi-Academy Trust

C/O Painsley Catholic College, Station Road, Cheadle, ST10 1LH

Tel: 01902 558569

Email: whistleblowing@sgacmat.co.uk

Version	Date	Action/Notes	Chair of Board of Directors
1	18/09/2025	Approved by BoD	J Bridgewater