



# Reach Schools

# Whistleblowing Policy

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| Academies to note:<br>This is a Reach Schools policy and should not be modified. |                       |



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## 1. Aims

The aims of this policy are to:

- encourage staff 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;
- provide staff with guidance as to how to raise those concerns; and
- reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of a staff member's contract of employment and it may be amended at any time.

## 2. Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](#).

This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

## 3. Who is covered by this policy?

This policy applies to all employees and workers at all levels of the organisation, including senior managers, directors, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as staff in this policy).



## 4. Definition

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures, including our Code of Conduct;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information; and
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Operations Director (the 'Whistleblowing Officer').



## 5. Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- Raise concerns with the Co-headteacher. This may be verbally or in writing and they may request that it is treated as confidential. If the concern is raised verbally, it is good practice to make a written record of the conversation in case this is needed for reference at a future date.
- If the allegation concerns the Co-headteacher the employee/worker should raise their concerns with CEO of Reach Schools (Rebecca Cramer- [rebecca.cramer@reachacademy.org.uk](mailto:rebecca.cramer@reachacademy.org.uk)) or Trustee (Juliette Cammaerts, [juliette.cammaerts@reachacademy.org.uk](mailto:juliette.cammaerts@reachacademy.org.uk)).
- The employee/worker may contact the CEO directly to raise their initial concerns. For context they may be asked why they did not raise this with the Co-headteacher or Line Manager. The employee/worker may also contact the CEO if their initial concerns have been dismissed and they wish to escalate the matter.
- If the allegation concerns the CEO, the Whistleblowing Trustee should be contacted (Juliette Cammaerts, [juliette.cammaerts@reachacademy.org.uk](mailto:juliette.cammaerts@reachacademy.org.uk)).

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.



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We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

## **6. Confidentiality**

We hope that staff 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 respect that. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should approach the Whistleblowing Officer and appropriate measures can be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline.

## **7. External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates



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a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager for guidance.

## **8. Investigation and Outcome**

Once you have raised a concern, we will conduct an initial assessment to determine the scope of any investigation. We will contact you within 5 days of raising the initial concern to arrange a confidential meeting. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. At all stages the whistleblower may be accompanied by a recognised trade union representative or a work colleague. The assessor may be accompanied by a note taker.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.



## 9. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this. Alternatively, you may contact the chair of the Finance, Risk and Audit Committee or our external auditors.

## 10. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## 11. Advice

If a worker wishes to seek advice before raising a concern they can seek advice from:

- A trade union representative
- The whistleblowing charity Protect which provides support for organisations and confidential independent advice to employees about wrongdoing in the workplace. You can contact Protect for free confidential advice or general enquiries at: 020 3117 2520 or the Protect Advice line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)