GREENSHAW
LEARNING TRUST

Greenshaw Learning Trust
Whistleblowing Policy

The Greenshaw Learning Trust is a charitable company limited by guarantee registered in England and Wales, company number 7633694, registered at Greenshaw Learning Trust, ORU Sutton, Throwley Way, Sutton, SM1 4AF.

Policy Title	GLT Whistleblowing Policy	
Category	Trust Policy	
Responsible Officer	Director of People	
Approved on	14th February 2025	
Minor technical or operational updates made	Name	
Review Cycle and next approval date	Three years February 2028	
Monitoring arrangements	This policy will be reviewed every 3 years, or sooner if required by statutory guidance updates. The implementation of this policy will be reviewed annually by the Headteacher.	
Associated Policies *Internal Policy Library* *Published GLT Policies* *For school policies please visit the school website*	This procedure is a constituent part of the GLT Human Resources Policy. The following Trust policies and procedures are directly related to and complement this procedure: ● GLT Equalities Policy ● GLT Grievance Procedure ● GLT Disciplinary Procedure ● GLT Code of Conduct	
This Policy is based on or takes into account the following legislation and guidance		

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Terminology

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher, executive headteacher or principal of the school/academy.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service means the services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a school Headteacher. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher should be read as the GLT CEO.
- Governance Colleague means a Trustee or Community Governance Committee (CGC) member.
- Responsible Officer means the member of the Director Team to which responsibility for the management of the policy, procedure or statement has been delegated by the Board of Trustees
- Policy or Policies should be read as including any procedures, reports, templates, models, statements and schedules etc. as specified in the GLT Policy Schedule. Categories of Policy are defined in 'Scope and Applicability'.

Scope & Applicability

- It is the responsibility of the Headteacher of each school, and the GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff follow this Policy and all Policies and Procedures across the Trust.
- If there is any question or doubt about the interpretation or implementation of this Policy, the 'Responsible Officer' or the GLT CEO should be consulted.
- Unless otherwise stated, all Policies apply to all schools within the Trust, all Trust employees (including temporary and agency staff), all pupils, all trustees and committee members (including members of community committees), all volunteers, and all visitors and contractors
- **This is a Trust Policy.** The GLT Board of Trustees has approved a set of Trust-wide policies and procedures. A Trust-wide policy/procedure is a single policy/procedure that must be followed by all schools and services in the Trust.

Introduction and Policy Statement

Greenshaw Learning Trust (GLT) is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, 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.

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

The GLT Director of People has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance. The Director of People will ensure that regular and appropriate training is provided to all managers and other staff who may deal with concerns or investigations under this policy.

What is whistleblowing?

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

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

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 (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.

If you are uncertain whether something is within the scope of this policy you should seek advice from a member of the senior leadership team, the School HR Lead, a member of the GLT HR team or from your Trade Union.

Raising a whistleblowing concern

If you suspect wrongdoing in the workplace:

• Disclosures should be in 'good faith'.
• You must not approach or accuse the individuals directly.
• You must not try to investigate the matter yourself.
• You must not convey your suspicions to anyone other than those with the appropriate authority, but you must do something.
• You may seek advice from your Trade Union representative.

In many case you may feel 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.

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:

- Head Teacher
- Education Director or Assistant Education Director (if the complaint is about a Headteacher)
- GLT Head of Service or Director (if the complaint is regarding a member of the Shared Service team)
- CEO (if the complaint is regarding a Director or Assistant Director)
- Clerk to the GLT Board of Trustees (if the complaint is about the CEO)
- Regional HR Partner, Head of HR or Director of People (in any circumstance)

Contact details are set out at the end of this policy.

The action taken by the Trust will depend on the nature of the concern. Where appropriate, the matters raised may:

• Be investigated by management, or through the GLT Staff Disciplinary Procedure.
• Be referred to the police.
• Need to be the subject of a referral to the Teaching Regulation Agency.
• Form the subject of an independent external enquiry.

In order to protect individuals and the Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations, which fall within the scope of specific procedures (for example child protection or capability issues), will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within 10 working days of a concern being raised under this policy the investigating officer considering the issues will write to the complainant:

• Acknowledging that the concern has been received.
• Indicating how it is proposed to deal with the matter.
• Giving an estimate (so far as reasonably practicable) as to how long it will take to provide a final response.
• Informing them whether any initial enquiries have been made; and
• Informing them whether further investigations will take place and if not, why not.

The amount of contact between the complainant and the officer considering the issues will depend on the nature of the matters raised; the potential difficulties involved; and the clarity of information provided. If necessary, further information will be sought from the complainant.

Where any meeting is arranged, the complainant has the right, if they so wish, to be accompanied by a Trade Union representative or a work colleague who is not involved in the area of work to which the concern relates.

Confidentiality and data protection

Staff should feel able to voice whistleblowing concerns openly under this policy. If you would prefer to raise your concern confidentially, every effort will be made to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, this will be discussed with you.

Staff are not encouraged to make disclosures anonymously, although every reasonable effort will be made to investigate all anonymous disclosures. 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. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Head of HR or one of the other contact points listed and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy. You can also seek advice and guidance via your Trade Union.
Where anonymous complaints are received, these will be investigated as far as is reasonable taking into account:

- the seriousness of the issue raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources

As part of the application of this policy, the Trust may collect, process and store personal data in accordance with our Data Protection policy, and complying with the requirements of Data Protection Legislation (being (i) the General Data Protection Regulation ((EU) 2016/679) (unless and until the GDPR is no longer directly applicable in the UK) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998, including the Data Protection Act 2018) in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our Privacy Notice, our retention guidelines and in line with the requirements of Data Protection legislation.

Investigation and outcome

Once you have raised a concern, an initial assessment will be made to determine the scope of any investigation. You will be informed of the outcome of the assessment. You may be required to attend additional meetings in order to provide further information.

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

You will be kept informed of the progress of the investigation and its likely timescale or completion wherever possible, however, sometimes the need for confidentiality may prevent specific details of

the investigation being shared, or an outcome, or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If it is concluded that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

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.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 5.2. Alternatively, you may contact the Chair of the GLT Board Trustees, via the Clerk, or our external auditors. Contact details are set out at the end of this policy.

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 (including via your Trade Union) before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline.

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 parent, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly.
However, we encourage you to report such concerns internally first, in line with this policy. You should contact your line manager, or other appropriate person, for guidance.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. Staff who raise genuine concerns under this policy, even if they turn out to be mistaken, will be supported.
Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. 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 one of the contacts outlined above 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. If you are involved in such conduct you may be subject to disciplinary action.

Contacts

Head of Governance and Compliance	Tim Brock Email: tbrock@greenshawlearningtrust.co.uk
Clerk to Board of Trustees and Governance Operations Manager	Kirsty Pritchard Email:kpritchard@greenshawlearningtrust.co.uk
Trust's external auditors	Buzzacotts (Contact via Director of Finance:) Email: amartin@greenshawlearningtrust.co.uk
CEO or Trust Directors	Contact via Executive Support Team kbennett@greenshawlearningtrust.co.uk mstewart@greenshawlearningtrust.co.uk orazaghi@greenshawlearningtrust.co.uk
GLT Director of People GLT Head of HR	kivackovic@greenshawlearningtrust.co.uk rdickerson@greenshawlearningtrust.co.uk
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: www.protect-advice.org.uk Email: whistle@protect-advice.org.uk
NSPCC Whistleblowing helpline	Helpline: 0800 0280285 Email: help@nspcc.org.uk