Horizons Specialist Academy Trust

Whistleblowing Policy

Reviewed and Adopted by the Resources & Audit & Risk Committee: 20 October 2026
Date of Next Review: Autumn term 2027
Responsible Officer: Chief Financial Officer

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This policy has been introduced to enable employees, and other persons working for the Horizons Specialist Academy Trust on school premises, together with suppliers and those providing services under a contract with the Trust, to voice serious concerns over malpractice and wrongdoing within the Trust in strict confidence.

In the case of an issue where an individual does not feel comfortable raising concerns with their line manager or supervisor, the following Nominated Officers and named Trustee have been identified.

- Laura Parker – Chief Financial Officer
- Email laura.parker@horizonstrust.org.uk

- Helen Mett – HR Manager
  Email: helen.mett@horizonstrust.org.uk

- Rebecca Whelan – Chief Executive
  Email: rebecca.whelan@horizonstrust.org.uk

- Chris Horn – Chair of the Board of Trustees
- Email chris.horn@horizonstrust.org.uk

Equality Impact Assessment

This Whistleblowing Policy is intended to provide a safe, confidential and accessible mechanism for employees, workers, contractors, suppliers and others associated with the Trust to raise concerns about malpractice, wrongdoing, misconduct or safeguarding issues without fear of reprisal, victimisation or disadvantage. The policy applies equally to all individuals and does not differentiate on the basis of any protected characteristic.

The policy is assessed as having a positive equality impact as it promotes a culture of openness, accountability and safeguarding, ensuring that all individuals are able to raise concerns and have those concerns investigated fairly and consistently. The protections afforded under the policy help reduce barriers that may otherwise prevent individuals from reporting concerns and support an inclusive working environment where people feel confident to speak up.

No adverse impacts on any protected group have been identified. The policy contains safeguards against victimisation and detriment and supports the Trust's commitment to fairness, transparency and compliance with employment, safeguarding and whistleblowing legislation. The policy will be implemented and monitored in accordance with the Equality Act 2010 and reviewed periodically to ensure it remains accessible, fair and effective for all stakeholders.

WHISTLEBLOWING REPORTING POLICY

(Sometimes referred to as the "Confidential Reporting" Policy)

1. INTRODUCTION

1.1 Employees are sometimes the first to realise that there may be something seriously wrong within their School. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the School; or they may fear harassment, victimisation or other reprisals. In these circumstances it may be easier to ignore the concern rather than report what may be just a suspicion of malpractice.

1.2 Horizons Specialist Academy Trust are committed to the highest possible standards of service provision and for full accountability for those services. In line with that commitment employees are encouraged to come forward and voice any serious concerns they may have about the Trust's work. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that any individual can do so without fear of reprisals. This policy is intended to encourage and enable an individual to raise serious concerns within the Trust rather than overlooking a problem or "blowing the whistle" outside.

1.3 The policy applies to all employees and those contractors working for the Trust on Trust premises, for example, agency staff, builders, drivers. It also covers suppliers and those providing services under a contract with the Trust. This policy should be read in conjunction with the Trust's Child Protection Policy and Staff Code of Conduct.

1.4 PUBLIC INTEREST DISCLOSURE ACT 1998

This Act protects workers who 'Blow the Whistle' about wrongdoing. It makes provision about the kind of disclosures, which may be protected; the circumstances in which the disclosures are protected; and the persons who may be protected. The provisions introduced by the Act protect most workers from being subjected to a detriment by their employer. Detriment may take a number of forms, such as denial of promotion, facilities or training opportunities which the employer would otherwise have offered. Employees may make a claim for unfair dismissal if they are dismissed for making a protected disclosure.

2. AIMS AND SCOPE OF THIS POLICY

2.1 This policy aims to:

a. provide avenues for the complainant to raise concerns and receive feedback on any action taken;

b. allow the complainant to take the matter further if they are dissatisfied with the Trust's response to the concerns expressed; and

c. reassure the complainant that they will be protected from possible reprisals or victimisation.

2.2 This policy does not replace the Trust's complaints procedure. There are also existing procedures in place relating to Disciplinary, Grievance, Capability etc. The Whistleblowing Policy is intended to cover concerns that fall outside the scope of these procedures e.g. malpractice or wrongdoing.

2.3 Thus any concern, including 'low level' concerns, that the complainant may have regarding the suspicion of malpractice or wrongdoing in any aspect of the Trust provision, or the conduct of staff within any of its academies, or others acting on behalf of the Trust, can and should be reported under this policy. Employees are expected to report any concerns of malpractice and wrongdoing. They may be liable to disciplinary action if they knowingly and deliberately do not disclose information relating to malpractice or wrong doing in any aspect of the Trust's provision or the conduct of staff or others acting on behalf of the Trust. This includes any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'.

3. WHAT IS MALPRACTICE OR WRONGDOING?

3.1 Malpractice and wrongdoing may be about something which: -

- is unlawful; or
- Is inconsistent with or against Trust policies; or
- is not in accordance with established standards of practice; or
- amounts to improper conduct by an employee.

The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions to be applied.

The following are examples of issues which could be raised under this policy. It is not intended to be an exhaustive list and there may be other matters which could be dealt with under this policy:

a. any unlawful act or omission, whether criminal or a breach of civil law

b. maladministration,

c. breach of any statutory code of practice

d. breach of, or failure to implement or comply with any policy determined by the Trust

e. failure to comply with appropriate professional standards or other established standards of practice

f. corruption or fraud

g. actions which are likely to cause physical danger or harm to any person, or give rise to a risk of significant damage to property

h. failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income, to the Trust or would otherwise seriously prejudice the Trust

i abuse of power, or the use of the Trust's powers and authority for any unauthorised or ulterior purpose

j. unfair discrimination in the Trust's employment or provision

k. dangerous procedures risking health and safety

l. abuse of clients

m. damage to the environment

n. other unethical conduct

o. Low level concerns – actions that are inconsistent with the staff code of conduct, including appropriate conduct outside of the Trust, but do not meet the threshold for a referral to the Local Authority Designated Officer (LADO).

4. SAFEGUARDS

4.1 HARASSMENT OR VICTIMISATION

The Trust recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice or from the Trust as a whole. The Trust will not tolerate any harassment or victimisation and will take appropriate action in order to protect an employee if they raise a concern in good faith. In addition, an employee is protected by law by the Public Interest Disclosure Act, which gives employees protection from detriment and dismissal where they have made a protected disclosure, provided the legal requirements of the Act are satisfied.

This does not necessarily mean that if an employee is already the subject of disciplinary procedures that those procedures will be halted as a result of a concern being raised under this policy.

4.2 CONFIDENTIALITY

It will be easier to follow up and to verify complaints if complainants are prepared to give their names. However, wherever possible the Trust will protect those who do not want their names to be disclosed. It must be appreciated that any investigation process may reveal the source of the information and a statement from the complainant may be required as part of the evidence.

4.3 ANONYMOUS ALLEGATIONS

Concerns expressed anonymously are much less powerful, but they will be treated with caution and considered at the discretion of the Trust. In exercising this discretion, the factors to be taken into account would include:

a. the seriousness of the issues raised;

b. the credibility of the concern; and

c. the likelihood of obtaining the necessary information and confirmation of the allegation.

4.4 DELIBERATELY FALSE OR MALICIOUS ALLEGATIONS

The Trust will view very seriously any deliberately false or malicious allegations it receives, and will regard the making of any deliberately false or malicious allegations by any employee as a serious disciplinary offence which could result in dismissal.

If an allegation is made in good faith but it is not confirmed by the investigation, no action will be taken against the complainant.

The Trust will try to ensure that the negative impact of either a malicious or unfounded allegation about any employee is minimised. However, it must be acknowledged that it may not be possible to prevent all of the repercussions potentially involved.

5. HOW TO RAISE A CONCERN

5.1 If the complainant suspects wrongdoing in the workplace:

- **they must not** approach or accuse the individuals directly
- **they must not** try to investigate the matter themselves
- **they must not** convey their suspicions to anyone other than those with the proper authority but **they must do** something!

5.2 As a first step, the complainant should normally raise concerns with their immediate line manager or supervisor. However, the most appropriate person to contact will depend on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if the complainant believes that the Chief Executive is involved in the matter of concern, or the normal channels of communication are inappropriate for some reason, they should approach the Chair of the Board of Trustees. If, for some significant reason, the complainant does not feel comfortable raising the concern with their line manager or supervisor, they should approach one of the Nominated Officers' identified on page 1 of this policy.

5.3 Concerns may be raised verbally but are better raised in writing. The complainant is invited to set out the background and history of the concern giving relevant names, dates and places where possible, and the reason why they are particularly concerned about the situation.

5.4 The earlier a concern is expressed; the easier it is to take appropriate action.

5.5 Although the complainant is not expected to prove the truth of an allegation that is made, it will be necessary for them to demonstrate to the person contacted that there are sufficient grounds for concern.

5.6 Advice and guidance on how matters of concern may be pursued can be obtained from the Nominated Officers stated page 2.

5.7 Alternatively, the complainant may wish to seek advice from their trade union or professional association.

5.8 Alternatively, as stated in '*Keeping Children Safe in Education'*, *September 2026)*, where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
• The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285.

6. HOW THE TRUST WILL RESPOND

6.1 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 disciplinary process
- be referred to the Local Authority Designated Officer
- be referred to the Police
- be referred to the Disclosure and Barring Service
- be referred to the Teaching Regulation Agency
- be referred to the Education, Skills and Funding Agency
- need to be the subject of a referral to the General Teaching Council
- form the subject of an independent enquiry

6.2 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.

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

6.4 Within 10 working days of a concern being raised under this procedure the Officer considering the issues will write to the complainant:

a. acknowledging that the concern has been received;

b. indicating how it is proposed to deal with the matter;

c. giving an estimate (so far as reasonably practicable) as to how long it will take to provide a final response;

d. informing them whether any initial enquiries have been made; and

e. informing them whether further investigations will take place and if not, why not

6.5 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.

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

6.7 The Trust will take appropriate steps to minimise any difficulties the complainant may experience as a result of raising a concern. For example, if they are required to give evidence in criminal or disciplinary proceedings the Trust will advise them about the procedure.

6.8 The Trust accepts that the complainant needs to be assured that the matter has been properly addressed. Therefore, subject to any legal restraints, the complainant will receive as much information as possible about the outcomes of any investigation.

7. HOW CAN THE MATTER BE TAKEN FURTHER?

7.1 This policy is intended to provide employees and other persons with an avenue to raise concerns within the Trust and it is hoped that they will take this option in the first instance. The Trust hopes they will be satisfied but if not, and the complainant feels it is right to take the matter outside the Trust, then depending upon the nature of the issue involved, the following are possible contact points:

1. relevant professional bodies or regulatory organisations
2. the Police
3. the General Teaching Council
4. the Education, Skills and Funding Agency
5. the local Citizen Advice Bureau
6. an independent legal adviser within the meaning of the Public Interest Disclosure Act 1998
7. a regulatory body designated for the purposes of the Public Interest Disclosure Act

7.2 If the complainant does wish to take the matter outside the Trust, they must first ensure that they do not disclose confidential information. In addition, if the complainant wishes to secure the protections afforded by the Public Interest Disclosure Act, they must ensure that their disclosure is protected within the meaning of the Act and that it complies with a set of specific conditions which vary according to whom the disclosure is made. If necessary, the complainant may wish to seek advice from their Trade Union or Professional Association.

8. RESPONSIBILITY FOR THE POLICY

8.1 The responsibility for the effectiveness and efficiency of this policy rests with the Board of Trustees. The Board of Trustees will be advised about and maintain records of concerns raised and the outcomes (but in a form which does not endanger the complainant's confidentiality).