

Whistleblowing Policy

Version 2.0

1. About this policy

1.1 Pele Trust is committed to the highest standards of openness, probity and accountability. Staff are often the first to know when something is seriously wrong within the Trust or one of its schools, and we want you to tell us. This policy explains how to raise a concern about wrongdoing, how we will respond, and the protection you have when you do so.

1.2 This policy may be used by anyone who works with or for the Trust: employees, agency workers, contractors and their staff, suppliers, trainee teachers and students on placement in our schools, volunteers, members, trustees and Academy Committee members. Employees and workers (including agency workers and those on training or work experience placements) have statutory protection under the Employment Rights Act 1996. Our commitment not to victimise anyone for raising a concern under this policy applies to everyone listed above.

1.3 This policy is approved by the Board of Directors, published on the Trust website and on each school website, and covered in induction for all staff. Headteachers are responsible for making sure that staff in their school know about it.

1.4 The Chief Executive Officer has overall responsibility for this policy and for ensuring that appropriate procedures are in place, that concerns are handled properly, and that the Board is kept informed as set out in section 9.

1.5 This policy sits alongside the Complaints Procedure, which deals with complaints about the Trust or its schools from parents and other external parties. It does not form part of any employee's contract of employment and we may amend it at any time.

2. What this policy covers

2.1 The law protects you when you disclose information that you reasonably believe shows, or is likely to show, one or more of the following, and that you reasonably believe it is in the public interest to disclose:

- (a) a criminal offence, including fraud, bribery or corruption;
- (b) a failure to comply with a legal obligation;
- (c) a miscarriage of justice;
- (d) danger to the health or safety of any person;
- (e) damage to the environment;
- (f) sexual harassment of any person; or

(g) the deliberate concealment of any of these.

2.2 The Trust also wants you to use this policy to raise other serious concerns about the conduct of the Trust, its schools or people acting on their behalf, including: a serious breach of the Staff Code of Conduct; a breach of examination or assessment regulations; misuse of public funds or Trust resources; a safeguarding concern about an adult who works with children, which will be referred under the safeguarding procedures (see 7.4); or conduct that falls seriously below the standards the Trust has set for itself. Whether or not a concern falls within the legal definition in 2.1, we will not victimise you for raising it under this policy.

2.3 If your concern is about your own employment, such as your pay, workload or treatment by a manager, the Grievance Policy is normally the right route and we will tell you if that is the case. Some concerns are both a grievance and a whistleblowing matter. Using the Grievance Policy, the Anti-harassment and Bullying Policy or this policy does not affect the legal protection you have as a whistleblower.

2.4 If your concern is about a service provided by another organisation on behalf of the Trust or a school, raise it with your Headteacher or the Chief Operating Officer in the first instance.

3. Sexual harassment

3.1 A report that someone has been, is being or is likely to be subjected to sexual harassment is a protected disclosure under whistleblowing law. This applies whether the harassment is directed at you or at someone else, whether the person responsible is a member of staff, a pupil, a parent or another third party, and whichever Trust policy you use to raise it. You will be protected from detriment and dismissal for raising it.

3.2 Reports of sexual harassment will normally be handled under the Anti-harassment and Bullying Policy, which sets out the support available to you and the Trust's duty to take reasonable steps to prevent sexual harassment. That policy states the same protection. Where a report of sexual harassment also raises wider concerns, for example about how earlier reports were handled, those concerns will be dealt with under this policy.

4. Your protection

4.1 We recognise that deciding to report a concern can be difficult. You are protected if you reasonably believe that your concern is in the public interest and that the information you are disclosing tends to show one of the matters listed in section 2, even if it later turns out that you were mistaken. You do not need to prove your concern, but you do need reasonable grounds for it.

4.2 We will not tolerate any harassment or victimisation of anyone who raises a concern under this policy, including informal pressure, and we will take appropriate action, including disciplinary

action, to protect you. Employees and workers who make a protected disclosure are legally protected from dismissal and from being subjected to any detriment for doing so.

4.3 Raising a concern under this policy will not be held against you in any other procedure, including disciplinary, capability, sickness absence or redundancy procedures that affect you now or in the future. The fact that you are subject to another procedure will not affect how seriously your concern is taken or how it is investigated.

4.4 If you raise a concern that you reasonably believe to be true and it is not confirmed by the investigation, no action will be taken against you. If you knowingly make a false allegation, or raise a concern maliciously or for personal gain, this may be treated as misconduct under the Disciplinary Policy if you are an employee of the Trust. Your motive for raising a concern does not remove your legal protection, although it may be taken into account by an employment tribunal when deciding compensation.

4.5 Nothing in your contract, in any settlement agreement or in any confidentiality undertaking prevents you from making a protected disclosure, and the Trust will not ask you to agree to any term that attempts to do so.

5. Confidentiality, records and anonymous concerns

5.1 We will treat your concern in confidence and will make every effort not to reveal your identity if you ask us not to. Information may need to be shared on a strict need-to-know basis to investigate or take forward the concern, and at the appropriate time you may need to come forward as a witness. Wherever possible we will discuss this with you first.

5.2 Records of concerns raised under this policy are held securely by the Chief Executive Officer's office, separately from personnel files, and are retained in line with the Trust retention schedule, which takes account of the six-month time limit for most employment tribunal claims. Personal data is processed in accordance with UK GDPR and the Trust Data Protection Policy. If someone you have raised a concern about makes a subject access request, your identity will be withheld so far as the law allows.

5.3 We encourage you to put your name to your concern. Concerns raised anonymously are harder to investigate and we cannot give you feedback on them, but they will be considered at the discretion of the Chief Executive Officer, taking into account the seriousness of the issue, the credibility of the concern, any evidence provided and the likelihood of confirming the allegation from other sources.

6. How to raise a concern

6.1 You should normally raise your concern with your Headteacher or, if you work in the central team, with the Chief Operating Officer. If your concern is about the Headteacher, or you do not

feel able to raise it in school, contact the Chief Executive Officer. Concerns about finance, estates, IT, procurement or central services may be raised directly with the Chief Operating Officer.

6.2 If your concern is about the Chief Executive Officer or the Chief Operating Officer, contact the Chair of Directors. If your concern is about the Chair of Directors or the Board, or you consider that the Chief Executive Officer and the Chair are both involved, contact the Chair of the Achievement and Standards sub Board, or the Chair of the Resources sub Board who are independent of the executive. Contact details are in section 11.

6.3 You may raise a concern verbally or in writing. It helps if you set out the background to the concern, including relevant dates, and why you are concerned. If you raise a concern verbally, the person you speak to will make a written note in this format and share it with you.

6.4 The earlier you raise a concern, the easier it is for us to act on it. You are not expected to prove your concern beyond doubt, but you will need to show that there are reasonable grounds for it.

6.5 You may find it easier to raise a concern together with colleagues who share the same concern. You may bring a trade union representative or a work colleague to any meeting held in connection with your concern.

6.6 If you are unsure whether or how to raise a concern, you can get free, confidential advice at any stage from the independent charity Protect on 020 3117 2520, or from your trade union. Seeking advice does not affect your protection.

7. How we will respond

7.1 The person you contact will decide, normally within 10 working days, whether and how your concern will be investigated, and will tell you. Where a concern is about a Headteacher, the Chief Executive Officer will commission the investigation and keep the Chair of the Academy Committee and the Chair of Directors informed.

7.2 Within 10 working days of your concern being raised we will write to you: acknowledging that the concern has been received; indicating how we propose to deal with it; giving an estimate of how long it will take to provide a final response; telling you whether any initial enquiries have been made and whether further investigation will take place and, if not, why not; and telling you what support is available to you.

7.3 To protect you and anyone who is the subject of a concern, we will make initial enquiries to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle is the public interest. Some concerns may be resolved by agreed action without a full investigation. If urgent action is needed, we will take it before any investigation is carried out.

7.4 Concerns which fall within the scope of a specific procedure (for example the safeguarding procedures, the Anti-harassment and Bullying Policy or the Disciplinary Policy) will normally be handled under that procedure. Safeguarding concerns about an adult who works with children will be referred to the Local Authority Designated Officer (LADO) in line with Keeping Children Safe in Education; LADO contact details are in section 12. Referral to another procedure does not affect your protection under this policy.

7.5 Depending on what is found, a concern may be investigated internally, by an independent investigator, internal audit or through the disciplinary process; referred to the police, the external auditor or a regulator; or made the subject of an independent inquiry.

7.6 How much contact we have with you during an investigation will depend on the nature of the concern and the clarity of the information you have provided. We may need to ask you for further information. You may be accompanied by a trade union representative or a work colleague at any meeting.

7.7 We will take steps to minimise any difficulties you experience as a result of raising a concern. You can ask for a named contact to keep you informed, for meetings to be held away from your normal workplace, and for access to the employee assistance programme or occupational health. If you are asked to give evidence in criminal or disciplinary proceedings, we will arrange advice for you about the process.

7.8 We accept that you need to know the matter has been properly addressed. Subject to legal constraints, we will tell you the outcome of the investigation in general terms. You must keep that information confidential.

7.9 If you are not satisfied with the response to your concern, or with the time being taken, you may escalate to the next person in the order set out in section 6.

8. Taking the matter further

8.1 This policy is intended to give you a way of raising concerns within the Trust, and we hope you will be satisfied with the action taken. If you are not, and you feel it is right to take the matter outside the Trust, section 12 sets out the bodies you may contact and explains how the legal protection applies to each.

8.2 If you do take a concern outside the Trust, you should not disclose information that should properly remain confidential, such as personal data about pupils or staff. Check this with the organisation you contact, or take advice from Protect or your trade union first.

9. Governance and reporting

9.1 The Chief Executive Officer maintains a confidential record of all concerns raised under this policy and their outcomes, in a form that does not endanger your confidentiality, and reports to the Board of Directors at least annually, including where no concerns have been raised.

9.2 The Board will be informed promptly of any concern that raises a matter the Trust is required to report to the Department for Education or to its auditors. Any member of staff may raise a concern with the Board through the Chair of Directors.

10. Related policies

Anti-harassment and Bullying Policy; Grievance Policy; Disciplinary Policy; Staff Code of Conduct; Safeguarding and Child Protection Policy; Complaints Procedure; Data Protection Policy; Finance Policy.

11. Internal contacts

Chief Executive Officer: Mr Kieran McGrane, k.mcgrane@peletrust.org.uk

Chief Operating Officer: Claire Leightley, c.leightley@peletrust.org.uk

Chair of Directors: Gerry Miller, g.miller@peletrust.org.uk

Chair of the Achievement and Standards sub-board : Marian Stromsoy, marianstromsoy@btinternet.com

Chair of the Resources Sub-Board: Ross Golightly, ross.golightly@sphaeraconsulting.co.uk

12. External contacts

12.1 Prescribed persons. You are protected in law if you raise a concern with the body responsible for the matter and reasonably believe that the information you disclose, and any allegation in it, is substantially true.

Department for Education (concerns about academies and academy trusts): online via the DfE customer help portal at customerhelpportal.education.gov.uk (you may use the guest option to remain anonymous), or by post to Customer Service Team, Department for Education, Cheylesmore House, Quinton Road, Coventry CV1 2WT. Telephone 0370 000 2288.

Ofsted (welfare of children in boarding and residential settings; safeguarding concerns about a school): 0300 123 3155, whistleblowing@ofsted.gov.uk

Health and Safety Executive (health and safety at work): 0300 003 1647, or online at www.hse.gov.uk/contact

Environment Agency (environmental damage): incident hotline 0800 80 70 60

Information Commissioner's Office (data protection): 0303 123 1113

National Audit Office (use of public money): 020 7798 7999

12.2 Other bodies. A disclosure to any of the following is protected only in limited circumstances, and you are encouraged to seek advice first: Northumbria Police (101); the Trust's external auditor, Azets (01642 221331); the NSPCC (020 7825 2505); Barnardo's (www.barnardos.org.uk/contact-us).

12.3 Safeguarding referrals. Safeguarding concerns about an adult who works with children are referred to the Local Authority Designated Officer: Northumberland LADO 07500 606174 (Monday to Thursday 08:30–17:00, Friday 08:30–16:30) or Out of Hours (Onecall): 01670 536400 (Available 24/7); North Tyneside LADO 0345 2000 109.

12.4 Advice. You may contact the following at any stage without affecting your protection: Protect, the independent whistleblowing charity (020 3117 2520); your trade union; Citizens Advice (0800 144 8848).

Document control

Version	Version 2.0
Status	Issued September 2026
Next review	September 2027
Policy owner	Chief Executive Officer
Approved by	Board of Directors

Version	Author	Date	Changes
2.0	Claire Leightley	September 2026	Public interest test replaces good faith test; sexual harassment added as a protected disclosure (Employment Rights Act 2025); escalation routes, external contacts, governance reporting and confidentiality clause wording updated.
1.0	Kieran McGrane	September 2025	Whistleblowing Policy 2025-26 (unnumbered issue).