



Wembley
Multi-Academy
Trust

ACHIEVEMENT FOR ALL

WHISTLEBLOWING POLICY

Policy reference	WMAT-12
Policy owner	CEO
Policy version	0.01
Date updated	October 2025
Approved by	Board of Trustees
Date approved	October 2025
Date of next review	September 2026



Contents

1. Introduction.....	1
2. Aims of the policy	2
3. What is whistleblowing?	2
4. Raising a whistleblowing concern	3
Stage 1	3
Stage 2	3
Stage 3	3
5. Anonymous disclosure	3
6. Raising unfounded malicious concerns	3
7. External disclosure	3
8. Monitoring and review of the policy.....	3

SCOPE OF THE POLICY

This policy applies to all schools in Wembley Multi-Academy Trust (“WMAT”).

1. Introduction

WMAT is committed to conducting its business with honesty, integrity and transparency and we expect all staff, trustees, governors, volunteers and contractors to maintain the highest of standards of ethical conduct in accordance with our Code of Conduct and safeguarding responsibilities.

However, we recognise that all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct and we recognise that individuals may encounter situations where they witness or suspect wrongdoing. Creating a culture of openness and accountability, where concerns can be raised without fear, is essential in order to prevent such situations occurring or to address them when they do occur.

We are grateful to those who speak up. This policy outlines how concerns can be raised, how they will be handled, and the protections available to those who do so in good faith. We acknowledge that raising concerns can be difficult and emotionally challenging, and we are committed to treating all disclosures with respect and sensitivity.

This policy applies to all schools within Wembley Multi-Academy Trust (“WMAT”) and covers all individuals working for or with the Trust. This includes employees, trustees, governors, volunteers, contractors, agency staff and any other individuals legally defined as ‘workers’ under the Public Interest Disclosure Act 1998.

This Policy does not form part of any employee’s contract of employment and WMAT reserves the right to amend, vary or withdraw it at any time.

2. Aims of the policy

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;
- To reassure staff that they should be able to raise genuine concerns in good faith and that they will be protected from reprisals or detriment when raising concerns in good faith.

This Policy operates within the framework of the Public Interest Disclosure Act 1998 (PIDA). Under PIDA, certain disclosures qualify for legal protection if they are made by a worker in the public interest and the individual reasonably believes that the disclosure tends to show wrongdoing of the type set out in this Policy. Such disclosures are known as “protected disclosures”. A worker does not need to prove that the alleged wrongdoing is true, only that they have a reasonable belief that it is true. Where a disclosure meets these requirements, the individual raising the concern will be protected from dismissal or any other detriment arising as a result of making the disclosure.

3. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Whistleblowing protections are set out in the Public Interest Disclosure Act 1998 (PIDA), which amended the Employment Rights Act 1996. Under PIDA, workers are protected from dismissal or detriment if they make a “qualifying disclosure” — that is, a disclosure of information made in the reasonable belief that it is in the public interest and tends to show one or more of the categories of wrongdoing listed above. A worker does not need to prove the allegation is correct, only that they hold a reasonable belief that the information disclosed is true.

This may include:

- criminal activity;
- danger to health and safety;
- financial fraud or mismanagement;
- negligence;
- failure to comply with any legal or professional obligation or regulatory requirement;
- miscarriages of justice;
- damage to the environment;
- breach of our internal policies and procedures including Code of Conduct, child protection and /or safeguarding;
- conduct likely to damage the reputation of the school;
- unauthorised disclosure of confidential information; or
- 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 WMAT's activities you should report it.

This policy should not be used for complaints relating to staff's own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

If staff are uncertain whether something is within the scope of this policy, you should seek advice from your Senior Line Manager in the first instance.

4. Raising a whistleblowing concern

Stage 1

WMAT hopes that in the first instance you will be able to raise any concerns with your Line Manager or Head of Department, speaking to them in person. They may be able to agree a way of resolving your concern quickly and effectively. If you reasonably believe your Line Manager or Head of Department to be involved in wrongdoing or for any other reason you do not wish to approach your Line Manager or Head of Department, then you should proceed straight to Stage 2.

Stage 2

Where you believe the matter is more serious, or you feel that the person in Stage 1 has not addressed your concern or you prefer not to raise it with them for any reason, you should contact a Senior Leadership Line Manager, or the Headteacher of your school, or the CEO.

The Senior Leadership Line Manager, the Head or the CEO will decide who is the most appropriate person to appoint to carry out an impartial investigation of the matter ("Investigating Officer"). The investigation may involve you giving a written statement. The Investigating Officer will report to The Senior Leadership Line Manager or the Head and the CEO who will initiate any necessary action. WMAT will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent WMAT from giving you specific details of the investigation or any disciplinary action taken as a result. In any event you are required to treat any information about the investigation as strictly confidential.

Stage 3

If at the conclusion of Stages 1 and/or 2 you reasonably believe that the appropriate action has not been taken , you should report the matter to the Chair of Trustees (Mr G. Whiley) by emailing chair@wmat.co.uk . This is also the process you should follow if your concerns relate to WMAT's CEO or other members of WMAT's senior leadership team.

The Chair of Trustees will arrange for an investigation to be undertaken by an appropriate person or agency in accordance with the principles outlined above.

5. Anonymous disclosure

WMAT does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if WMAT cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith.

6. Raising unfounded malicious concerns

You are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. However, if an individual raises malicious , unfounded concerns or attempts to make mischief this will also be taken seriously and constitute a disciplinary offence.

7. External disclosure

While WMAT encourages concerns to be raised internally in the first instance, we recognise that there may be circumstances where a worker feels unable to do so. In such cases, a disclosure may be made to a relevant "prescribed person" under the Public Interest Disclosure Act 1998. Examples include:

- Ofsted – for concerns about the welfare and safeguarding of children in schools;
- The Education and Skills Funding Agency (ESFA) – for concerns about financial management or governance in academies;
- The Department for Education (DfE);
- The Local Authority Designated Officer (LADO) – for concerns about safeguarding involving staff;
- Other prescribed regulators as listed by the UK Government.

8. Monitoring and review of the policy

This policy is reviewed each academic year by the Trustees of WMAT.