

# **Rise Multi Academy Trust: Whistleblowing Policy 2026**



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**Approved by the Trust Board: September 2026**

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**Signed:** 

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## 1. Introduction and Aims

Rise Multi Academy Trust is committed to the highest possible standards of openness, probity and accountability. Colleagues are often the first to recognise that something may be seriously wrong within an organisation. The Trust therefore encourages individuals to raise genuine concerns promptly and provides routes through which those concerns can be considered fairly and appropriately.

Colleagues are often the first to realise that there may be something seriously wrong within an organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to others or to the Trust. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report a suspicion of malpractice. This policy encourages employees to raise such concerns using the internal mechanisms set out below.

This policy is intended to encourage and enable concerns to be raised within the Trust wherever appropriate, rather than being overlooked. A person who raises a genuine concern on a reasonable basis will not be treated disloyally or disadvantaged for doing so.

This policy should be used to raise serious concerns **which are in the public interest and where an individual genuinely feels there is evidence of malpractice, impropriety or wrongdoing.**

The aims of this policy are to:

- encourage the prompt reporting of suspected wrongdoing in the public interest;
- explain who may raise a concern and the routes available;
- set out how the Trust will assess, investigate and respond to concerns;
- explain the protection and support available to a person raising a concern;
- provide appropriate routes for external escalation; and
- ensure that lessons, control improvements and actions arising from concerns are recorded and monitored.

## 2. Scope

This policy does not form part of any employee's contract of employment and may be amended by the Trust at any time.

This policy applies to current and former employees and workers, including headteachers, teachers, support staff, fixed-term and casual workers, agency workers, self-employed consultants, contractors, volunteers, governors, trustees and individuals working for organisations that provide services to the Trust.

For the purposes of this policy, "Trust" includes Rise Multi Academy Trust, its central team and each academy within the Trust.

The policy will be implemented in accordance with the Trust's Articles of Association, Scheme of Delegation and other relevant governance arrangements.



### 3. Legislation

The requirement to have clear whistleblowing procedures in place is set out in the Academy Trust Handbook. This policy also takes account of government guidance on whistleblowing and the Trust's funding agreement and Articles of Association.

The statutory provisions governing protected disclosures are principally contained in the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025.

From 6 April 2026, sexual harassment is expressly included as a category of wrongdoing that may form the subject of a protected disclosure where the individual reasonably believes that the disclosure is in the public interest and the other statutory conditions are met.

### 4. Definition of whistleblowing

Whistleblowing is the disclosure of information relating to suspected wrongdoing or danger at work. A disclosure that meets the relevant legal tests is known as a protected disclosure.

To qualify for statutory protection, the person raising the concern must reasonably believe that the disclosure is made in the public interest and tends to show that one or more of the following has occurred, is occurring or is likely to occur:

- a criminal offence, including fraud, theft, bribery or corruption;
- a failure to comply with a legal obligation or statutory requirement;
- a miscarriage of justice;
- a danger to the health or safety of any individual;
- damage, or a risk of damage, to the environment;
- sexual harassment; or
- the deliberate concealment of information relating to any of the above.

Concerns may also include serious breaches of the Trust's financial management procedures, policies or Code of Conduct where the concern meets the public interest test.

A whistleblower is a person who raises a genuine concern relating to suspected wrongdoing. A person does not need to prove the wrongdoing before raising a concern, but they should explain the information on which their reasonable belief is based.

Not all concerns about the Trust or an individual academy amount to whistleblowing. Where appropriate, concerns may be resolved through an informal discussion with a line manager or appropriate leader.

A concern relating primarily to an individual's own employment, treatment at work or contract of employment will normally be considered under the Trust's Grievance Policy. Complaints from parents, pupils or members of the public will normally be considered under the Trust's Complaints Policy.



Allegations of sexual harassment may be raised under the Grievance Policy where the concern relates primarily to the individual's own treatment at work. They may be considered under this policy where the disclosure meets the statutory requirements for a protected disclosure, including the public interest test. Where appropriate, the relevant employment procedure may be applied alongside the protections provided by this policy.

Safeguarding, fraud, financial irregularity, health and safety, data protection or other regulated matters may also require action under a separate Trust procedure or an external reporting duty. Applying another procedure does not remove any whistleblowing protection that applies.

When colleagues have a concern they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

[Further guidance](#) on the difference between a whistle-blowing concern and a grievance, which colleagues may find useful if unsure.

## **5. Protection & Support**

The Trust will not tolerate retaliation, harassment, victimisation or any other detrimental treatment because a person has raised, or is believed to have raised, a genuine whistleblowing concern.

Detrimental treatment may include dismissal, disciplinary action, threats, intimidation, exclusion, disadvantage in work allocation or development opportunities, or other unfavourable treatment connected with the disclosure.

Any person who believes that they have experienced detrimental treatment should report this immediately to the Chief Executive Officer or the Chair of Trustees. If either is implicated, the matter should be raised through an alternative route in section 7. An allegation of retaliation will be considered separately and may lead to disciplinary or other appropriate action.

The Trust recognises that raising a concern can be difficult. Reasonable support may include a named point of contact, agreed arrangements for updates, access to employee assistance or wellbeing support, and signposting to a trade union, professional association or independent whistleblowing advice service.

The person raising the concern may be accompanied at meetings under this policy by a trade union representative, professional association representative or work colleague. The companion must respect the confidentiality of the process.

## **6. Procedure for colleagues to raise a whistleblowing concern**

### **6.1 When to raise a concern**

Colleagues should consider the examples in section 3 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

### **6.2 Who to report to**

Wherever you work in our trust, you can report whistle-blowing concerns to one of the following people:

- the Chief Executive Officer
- the Chair of Trustees.

If you need to obtain the contact details for any of these people, you can email [admin@risemat.co.uk](mailto:admin@risemat.co.uk) and ask for them.

Any other member of staff receiving a whistleblowing concern must refer it immediately to one of the above.

### **6.3 How to raise the concern**

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible.

Colleagues raising a concern should also include details of any personal interest in the matter. **Appendix A** is provided for this purpose.

### **6.4 Anonymous concerns**

Individuals are encouraged to identify themselves because this may assist the Trust to assess and investigate the concern and provide appropriate protection and feedback. However, anonymous concerns will be considered.

When deciding what action to take, the Trust will consider:

- the seriousness of the matter raised;
- the credibility and specificity of the information;
- the availability of supporting evidence;
- the likelihood that the concern can be substantiated; and
- whether a fair and effective investigation can be conducted without knowing the person's identity.

An anonymous reporter should understand that the Trust may be unable to seek clarification, provide updates or communicate the outcome.

## **7. Responding to a concern**

The authorised recipient will acknowledge the concern in writing within 10 working days of receipt.

So far as reasonably possible, the acknowledgement will:

- confirm that the concern has been received;
- identify the person responsible for the initial assessment;
- explain how the Trust proposes to deal with the matter;
- state whether further enquiries or an investigation are proposed and, if not, explain why;
- provide an indicative timescale for the next update; and
- confirm the arrangements for future communication.

Urgent action or an external referral may be made before or instead of an initial meeting where this is necessary to protect a person, preserve evidence or meet a statutory duty. Initial enquiries will determine whether the matter falls within this policy, whether immediate protective or evidence-preservation measures are required, and what form any further investigation should take.

Depending on the nature of the concern, the matter may:

- be investigated internally by an appropriately senior and impartial investigator;
- be investigated by an external or independent person;
- be referred to internal or external audit;
- be considered under another Trust procedure;
- be referred to a local authority, regulator or other prescribed body;
- be referred to the police or another enforcement agency; or
- be resolved through agreed corrective action where a formal investigation is unnecessary.

## **8. Investigation**

Where an investigation is warranted, the investigator must have appropriate authority and competence and must, so far as practicable, be independent of the matters and individuals concerned. Any actual or potential conflict of interest must be declared immediately and an alternative investigator appointed.

The purpose of the investigation is to establish the relevant facts and gather appropriate evidence. This may include reviewing documents, electronic records, financial information and other relevant material, and interviewing the person raising the concern, witnesses and individuals who are the subject of allegations.

Investigations will be conducted fairly, objectively and as promptly as the circumstances allow. The person raising the concern will be informed of how the matter is being investigated and will receive proportionate updates, subject to legal and confidentiality restrictions.

A person who is the subject of an allegation will be treated fairly. They will be informed of the allegation and given an appropriate opportunity to respond unless doing so would prejudice an investigation, safeguarding action, criminal enquiry or other lawful process.

## **9. Investigation Outcome**

At the conclusion of the consideration or investigation, the investigator will prepare a written report recording the evidence considered, findings, conclusions, recommendations, corrective action and any required external referral.

The person who raised the concern will be informed in writing when the matter has concluded. So far as legally and reasonably possible, the communication will confirm:

- whether the concern was upheld, partially upheld, not upheld or could not be determined;
- whether action has been or will be taken;
- whether the matter has been referred to another body; and
- any route available for raising continuing concerns.

Information may be withheld where disclosure would breach confidentiality, data protection requirements, legal privilege, safeguarding duties or the rights of another person. Details of disciplinary action concerning another employee will not normally be disclosed.

Where lessons are identified, the Trust will record the action required, the responsible owner and the completion date. Completion will be monitored through the appropriate governance or assurance arrangements.

While the Trust cannot guarantee a particular outcome, concerns will be handled fairly and appropriately.

## **10. Malicious or vexatious allegations**

No disciplinary or other adverse action will be taken against a person solely because a concern raised on a reasonable basis is not upheld or cannot be substantiated.

Where there is evidence that a person knowingly made a false allegation or deliberately provided false information maliciously or in bad faith, the Trust may consider action under the relevant disciplinary or contractual procedure.

A concern must not be characterised as malicious or vexatious simply because it is mistaken, repeated, strongly expressed or unsupported by sufficient evidence.

## **11. Confidentiality**

The Trust will protect the identity of a person raising a concern and restrict information to those who need it for the assessment, investigation or management of the matter, so far as reasonably practicable and lawful.

Absolute confidentiality cannot be guaranteed. It may be necessary to disclose the person's identity where:

- the person has consented;
- disclosure is required by law or by a regulator, court or law-enforcement body;
- disclosure is necessary to conduct a fair investigation or formal process;
- the information is already lawfully in the public domain; or
- information is disclosed on a legally privileged basis to obtain professional advice.



Where disclosure of identity appears necessary, the Trust will, wherever reasonably practicable and lawful, discuss this with the person before disclosure.

All participants must maintain appropriate confidentiality and must not share information except as authorised or required by law. Information will be handled in accordance with the Trust's data protection and records retention arrangements.

## **12. Escalating concerns beyond the trust**

The Trust encourages concerns to be raised internally wherever appropriate so that it has an opportunity to address them. However, a person may seek independent advice or make a disclosure to an appropriate external body where the legal requirements for doing so are met.

Depending on the nature of the concern, an appropriate external body may include:

- the Department for Education;
- Ofsted;
- the relevant local authority or safeguarding authority;
- HM Revenue and Customs;
- the Health and Safety Executive;
- the Information Commissioner's Office;
- the National Audit Office;
- the police or another law-enforcement agency;
- a relevant professional or regulatory body; or
- another prescribed person or body designated by legislation.

Independent and confidential advice may be obtained from Protect, the whistleblowing charity, or from a trade union or professional adviser.

A person considering external disclosure should seek appropriate advice to ensure that the concern is directed to the correct body and that unrelated confidential or personal information about pupils, employees or the Trust is not unnecessarily disclosed.

Disclosure to the media will rarely be appropriate and may not attract statutory protection. A person is strongly encouraged to obtain independent legal or specialist whistleblowing advice before considering such a disclosure.

## **13. Approval**

This policy will be approved by the Trust Board and reviewed at least annually, or sooner where there is a change in legislation, statutory guidance, Trust structure or learning from a relevant case.

Minor administrative amendments may be approved in accordance with the Trust's governance arrangements. Material changes must be submitted to the Trust Board for approval.



## Confidential Reporting Form (Whistleblowing)

Please complete and return this form marked 'Confidential' to [admin@risemat.co.uk](mailto:admin@risemat.co.uk)

|                                                                                    |                                        |     |                         |
|------------------------------------------------------------------------------------|----------------------------------------|-----|-------------------------|
| Does the person want this matter to be dealt with in confidence?<br>(tick one box) |                                        | Yes | No                      |
| Name of person raising Whistleblowing concern                                      |                                        |     |                         |
| Role or Post                                                                       |                                        |     |                         |
| School Name (where appropriate)                                                    |                                        |     |                         |
| Contact Address                                                                    |                                        |     |                         |
| Contact number                                                                     |                                        |     |                         |
| Date of Disclosure                                                                 |                                        |     |                         |
| <b>Background and history of the concern (giving relevant dates)</b>               |                                        |     |                         |
|                                                                                    |                                        |     |                         |
| Have any other persons and/or organisation's been contacted?<br>(tick one box)     |                                        | Yes | No                      |
| If 'yes' please give details:                                                      |                                        |     |                         |
| Does the individual have any personal interest in the matter?<br>(tick one box)    |                                        | Yes | No                      |
| <b>For completion by the recipient</b>                                             |                                        |     |                         |
| Date concern received                                                              |                                        |     |                         |
| Date initial meeting undertaken                                                    |                                        |     |                         |
| Further Action (tick appropriate box below)                                        |                                        |     |                         |
|                                                                                    | None Required                          |     | Disciplinary process    |
|                                                                                    | Investigation by relevant senior staff |     | Refer to the Police     |
|                                                                                    | Internal audit required                |     | External audit required |
| Other action, please state:                                                        |                                        |     |                         |

## Confidential Reporting Form (Whistleblowing)

Please complete and return this form marked 'Confidential' to [admin@risemat.co.uk](mailto:admin@risemat.co.uk)

### Individual person raising the concern

*Please sign below and enter any comments, if any in this box.*

Signed:.....Date:.....

### To be signed by the recipient

*Please sign below and enter a summary of the outcome.*

Signed:.....Date:.....

