

LEARNING ACADEMY PARTNERSHIP
Colleague Whistleblowing Policy

This policy supersedes all previous Colleague Whistleblowing policies

Policy Reference No	PT007
Review Frequency	Annually
Reviewed	September 2026
Next Review Date	Autumn 2027

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Amendments

Policy Date	New Version Number	Summary of change
Sep 25	V1.9	Comprehensive review of the entire policy to ensure more modern, inclusive, and considered language that is clearer and more concise, reflecting our organisational values around equality, diversity, and respect.
Sep 25	V1.9	Accessibility &n Language Support section added (1)
Sep 25	V1.9	Trust Governance Professional delegation to manage whistleblowing complaints (7.2)
Sep 25	V1.9	Confidentiality, monitoring & data protection section updated (13)
Sep 25	V1.9	Review of policy section updated (14)
Sep 25	V1.9	Appendix A updated
Sep 26	V1.10	Full policy review to modernise language and improve clarity, consistency, EEDI and legislative alignment.
Sep 26	V1.10	Use of language section added (2)
Sep 26	V1.10	Use of AI, Ed Tech, E-Safety & Dig Tech section added (5)
Sep 26	V1.10	Recording of meetings sections added (6)
Sep 26	V1.10	Roles & responsibilities section added (4)
Sep 26	V1.10	Appendix A updated

Union Consultation/External Review

Date	Action (meeting, email etc.)	Comments	Attendance
20/11/18	Draft policy sent to all unions and staff for comment	30 day consultation period	

** Colleagues – Refers to employees*

**Headteacher includes Executive Head*

**For the avoidance of doubt, where this policy refers to a 'Senior Leader', this includes members of the Trust Leadership Team (TLT) and other senior leaders as defined within the Trust's Scheme of Delegation, including for the purposes of decision-making, panels and appeals.*

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1. Accessibility and Language Support

1.1 If you require this policy in an alternative format or language, please contact the People Team or your Headteacher/Manager. We are committed to ensuring our policies are accessible to everyone, and we will work with you to provide appropriate support or resources.

2. Use of language

In this policy, the terms "*we*", "*us*" and "*our*" refer to the Learning Academy Partnership (South West). These terms are used for clarity and ease of reading and should be interpreted as applying to the Trust at all times.

3. Introduction

3.1 We are committed to the highest standards of honesty, integrity, and accountability. We expect all colleagues to meet these standards in line with our Code of Conduct.

3.2 While concerns are rare, things can sometimes go wrong or risks may arise. A culture of openness and speaking up helps us to address issues early, protect people from harm, and uphold public trust.

3.3 This policy explains how to raise concerns safely and how we will respond. It has been developed following consultation with recognised trade unions.

3.4 This policy does not form part of any colleague's contract of employment and may be amended at any time.

4. Scope and purpose

4.1 The aims of this policy are:

- To encourage colleagues 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 colleagues with guidance on how to raise concerns,
- To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken,

4.2 This policy applies to all colleagues, Trustees, Local committee members, consultants, contractors, casual and agency colleagues and volunteers (collectively referred to as colleagues in this policy).

5. Equality, Equity, Diversity, and Inclusion (EEDI)

5.1 We value the uniqueness of every individual and are committed to creating an inclusive culture where everyone can be their authentic selves. Rooted in the diverse communities we serve, we believe we are stronger together and achieve our best when all colleagues feel included, respected and able to thrive.

5.2 We have zero tolerance for behaviours that cause harm related to identity, background, culture, neurodivergence, or protected characteristics whether real or perceived. Identity-based harm, including discrimination, harassment, microaggressions, hate speech, or violence, is unacceptable and undermines our values and inclusive culture.

5.3 We encourage all colleagues to report any incidents of identity-based harm they experience or witness. Reports will be handled sensitively, and anyone raising concerns in good faith will be supported and protected from victimisation or retaliation.

5.4 Our commitments are grounded in the Equality Act 2010, which protects individuals from unlawful discrimination and promotes equality of opportunity across all protected characteristics.

6. Use of Artificial Intelligence (AI), Education Technology (EdTech), E-Safety and Digital Technologies

6.1 Colleagues must use all digital technologies, including Artificial Intelligence (AI), Education Technology (EdTech), social media, wearable technology (such as smart glasses, including Meta Smart Glasses), and other emerging technologies, safely, responsibly, ethically, and in accordance with our policies, safeguarding requirements, data protection legislation, and professional standards. Colleagues must only use approved systems, applications, and devices for work related purposes and must not use any technology in a way that could compromise the safety, wellbeing, privacy, dignity, or confidentiality of pupils, colleagues, or the organisation. Any concerns relating to online safety, cybersecurity, AI use, data protection, inappropriate content, recording, monitoring, or safeguarding must be reported immediately through the appropriate procedures.

7. Recording of Meetings

7.1 Covert (secret) recordings of any meetings are strictly prohibited. Any recording of a meeting, whether audio or visual, may only take place with the prior knowledge and explicit consent of all participants and with approval from us.

8. Roles and Responsibilities

8.1 **We are responsible for:**

- Fostering a culture of openness and integrity where colleagues feel safe and confident to speak up
- Maintaining clear, accessible whistleblowing arrangements and reporting routes
- Responding to concerns promptly, fairly, and consistently
- Ensuring concerns are assessed and investigated proportionately and appropriately
- Protecting individuals who raise concerns in good faith from retaliation or detriment
- Maintaining confidentiality and handling information in line with data protection requirements
- Learning from whistleblowing concerns to improve practice, prevent harm, and strengthen accountability

8.2 **Leaders and Managers are responsible for:**

- Modelling ethical behaviour and encouraging a speak-up culture
- Ensuring colleagues are aware of this policy and know how to raise concerns
- Listening carefully to concerns and taking them seriously
- Escalating concerns promptly and appropriately in line with this policy

- Maintaining confidentiality and protecting individuals from retaliation
- Supporting the wellbeing of colleagues involved in whistleblowing processes
- Seeking advice where required and cooperating fully with any investigation

8.3 **Governance Professional (Whistleblowing Officer) is responsible for:**

- Acting as a key point of contact for whistleblowing concerns
- Overseeing the receipt, handling, and recording of whistleblowing disclosures
- Ensuring concerns are managed in line with this policy and relevant legal requirements
- Coordinating investigations or resolution pathways, where appropriate
- Ensuring appropriate senior oversight and governance reporting
- Maintaining a central, confidential record of whistleblowing concerns

8.4 **All colleagues are responsible for:**

- Raising concerns promptly where they reasonably suspect wrongdoing, risk, or unethical behaviour
- Acting in good faith and in the public interest when raising concerns
- Cooperating with any assessment or investigation
- Maintaining confidentiality throughout the process
- Treating others involved in the process with respect and professionalism
- Acting in line with our values and code of conduct
- Ensuring any use of Educational Technology (Ed Tech) tools is appropriate, transparent, and in line with our policies and procedures

9. What is Whistleblowing?

9.1 Whistleblowing is the disclosure of information about suspected wrongdoing or risk connected with our work. The law protects workers who raise genuine concerns about certain matters, known as "qualifying disclosures".

9.2 A qualifying disclosure is one made in the public interest, where the individual reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur.

9.3 This may include:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures (including our code of conduct)
- Conduct likely to damage our reputation
- Unauthorised disclosure of confidential information
- Other unethical behaviour
- Deliberate concealment of any of the above matters

9.4 A whistleblower is a person who raises a genuine concern relating to any of the matters listed above. Where you reasonably believe wrongdoing or risk affects our activities, you should raise it under this policy.

9.5 This policy must not be used for concerns relating solely to your own personal employment circumstances (for example, the way you have been treated at work). These matters should normally be raised through the Grievance Procedure.

9.6 Concerns relating to bullying, harassment (including sexual harassment), discrimination or other inappropriate conduct towards an individual are not normally whistleblowing matters and should be raised under the appropriate workplace policy, such as the Harassment Policy, Grievance Procedure or Code of Conduct.

9.7 However, where such concerns indicate a wider organisational failure, repeated inaction, a culture that discourages reporting, or deliberate concealment by senior leaders, they may constitute a whistleblowing disclosure and should be raised under this policy.

9.8 If you are unsure whether a concern falls within the scope of this policy, you may seek confidential advice from the People Team.

9.9 Where a concern relates to safeguarding or the welfare of a child or young person, it should be raised in line with our Safeguarding and Child Protection Policy (for example, via the Designated Safeguarding Lead). The principles of this whistleblowing policy may still apply.

10. Raising a Whistleblowing concern

10.1 Where appropriate, colleagues are encouraged to raise concerns with their Headteacher or Manager in the first instance. Concerns may be raised verbally or in writing. In many cases, issues can be addressed quickly and effectively at this stage.

10.2 If you feel unable to raise the matter with your Headteacher or Manager, if your concern has not been addressed, or if they are the subject of the concern, you may raise it with one of the following:

- The Governance Professional (Whistleblowing Officer), who has delegated responsibility for managing whistleblowing concerns
- The Chief Executive Officer
- The Lead for People
- The Chair of the Board

10.3 Contact details are set out at the end of this policy (**Appendix A**).

10.4 If you are unsure whether your concern should be raised as whistleblowing or under another policy (for example, the Harassment Policy), you are encouraged to seek confidential advice from the People Team or one of the named contacts before deciding how to proceed

10.5 We will arrange to meet with you as soon as reasonably practicable to discuss your concern. You may be accompanied by a colleague or trade union

representative at any meeting held under this policy. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

10.6 We will make a written summary of your concern and provide you with a copy. We will explain how the matter will be handled and, where appropriate, keep you informed of progress.

11. Confidentiality

11.1 We encourage colleagues to raise whistleblowing concerns openly wherever possible. However, if you wish to raise a concern confidentially, we will make every reasonable effort to protect your identity. If it becomes necessary for those investigating your concern to know who you are, we will discuss this with you in advance.

11.2 We do not encourage disclosures to be made anonymously, as this may limit our ability to investigate the concern fully or to seek clarification. Colleagues who are worried about potential reprisals if their identity is disclosed are encouraged to raise their concern with one of the alternative contacts listed in Section 8, so that appropriate steps can be taken to protect confidentiality and provide support.

11.3 If you are unsure how to proceed, you may seek confidential, independent advice from Public Concern at Work. Contact details are provided in **Appendix A.**

11.4 Where anonymous concerns are raised, we will decide whether to investigate based on:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from available information or other sources

11.5 We will maintain a central, confidential record of disclosures made under this policy, in line with data protection requirements.

12. External disclosures

12.1 Our aim is to foster a culture of openness and integrity in which colleagues feel confident and safe to raise concerns internally. We therefore encourage colleagues to use our internal reporting routes in the first instance, as set out in this policy, so that concerns can be addressed promptly and appropriately.

12.2 We recognise that, in certain circumstances, you may consider it necessary to raise a concern with an external body. The law allows whistleblowers to make qualifying disclosures to prescribed external regulators, particularly where:

- you reasonably believe the information is substantially true
- The concern falls within the remit of an external regulator
- you reasonably fear reprisal or that the concern will not be addressed internally

12.3 In such cases, we recommend you seek independent advice before contacting an external body. You may wish to contact:

- Public Concern at Work (an independent whistleblowing charity)
- Your trade union
- A legal adviser

12.4 A list of prescribed regulators is maintained by the Department for Business and Trade. Public Concern at Work can also provide guidance on who to contact, depending on the nature of your concern (e.g. safeguarding, fraud, health and safety).

12.5 Raising concerns via the media is extremely unlikely to be considered appropriate or protected under the Public Interest Disclosure Act. You should only consider this route after taking legal advice, and only in exceptional circumstances.

12.6 In rare cases where your concern relates to a third party, such as a supplier, contractor, or partner organisation, and you reasonably believe the issue sits within their responsibility, you may raise the concern with them directly. However, we strongly encourage you to report the matter internally first so that we can offer guidance and support.

12.7 Our priority is to ensure that colleagues feel protected and empowered to raise concerns safely, whether internally or externally. We will continue to support responsible disclosures made in the public interest and will not tolerate retaliation against anyone who raises a concern in good faith.

13. Wellbeing, Protection and Support for Whistleblowers

13.1 We recognise that speaking up, particularly about sensitive or serious concerns, can feel difficult and emotionally challenging. We are committed to fostering a culture of psychological safety, where colleagues feel supported and protected when raising concerns.

13.2 No individual will suffer any detrimental treatment for raising a genuine concern in good faith, regardless of whether the concern is ultimately upheld. Detrimental treatment includes dismissal, disciplinary action, bullying, threats, marginalisation, or any other unfavourable treatment linked to whistleblowing.

13.3 If you believe you have experienced any negative impact as a result of raising a concern, you should notify one of the contacts listed in Section 8 as soon as possible. Where the matter cannot be resolved informally, it may be escalated through our Grievance Procedure.

13.4 Any individual who retaliates against, intimidates, or victimises a whistleblower will be subject to disciplinary action. Such behaviour is taken seriously, as it undermines our values, integrity, and culture of openness.

13.5 We recognise that whistleblowing processes may affect not only the person raising the concern, but also those who are subject to it and any witnesses involved. Confidential emotional and psychological support is available via our counselling hotline (see Appendix A), and managers are encouraged to provide additional wellbeing support where appropriate.

13.6 Where a disclosure relates to identity-based harm, harassment (including sexual harassment), or marginalisation, we will take steps to ensure that those affected feel supported throughout the process, using trauma-informed and culturally aware approaches.

13.7 Support is available throughout all stages of the process

14. Investigation and outcome

14.1 Once a concern has been raised, we will carry out an initial assessment to determine the most appropriate response. This may involve a formal investigation

or another resolution pathway. You will be informed of the outcome of this assessment and kept updated throughout the process where appropriate.

14.2 Where appropriate, we may appoint an investigator or a team of investigators. This may include colleagues with relevant specialist knowledge or experience. All investigators will approach concerns with impartiality, cultural sensitivity, and an awareness of potential unconscious bias. We are committed to applying equity in our processes to ensure fair treatment for all parties.

14.3 The investigator(s) will gather relevant information and may make recommendations to address the concern, improve practice, or reduce the risk of future harm. Findings and recommendations will be shared with the Chief Executive Officer and the Chair of the Board for consideration and any necessary action.

14.4 Where a concern relates to identity-based harm, harassment (including sexual harassment), or marginalisation, we will take additional care to ensure:

- The psychological safety of those involved
- A trauma-informed and survivor-sensitive approach
- That investigators are appropriately trained or supported

14.5 While it may not always be possible to share every detail, particularly where confidentiality or legal constraints apply, we will keep you informed of progress and provide a clear summary of the outcome where reasonably practicable.

14.6 If it is determined that a concern was raised maliciously, in bad faith, or with intent to cause harm, this may lead to disciplinary action. However, no action will be taken against individuals who raise genuine concerns in good faith, even where those concerns are not upheld.

14.7 We are committed to learning from every case to improve our culture of openness, safety, and accountability.

15. If you are not satisfied

15.1 While we cannot always guarantee the outcome you are seeking, we are committed to handling concerns fairly, proportionately, and appropriately. Raising concerns under this policy helps us to do so.

15.2 If you are not satisfied with how your concern has been handled, you may raise the matter with one of the alternative contacts listed in Section 8. You may also contact the Chair of the Board or our external auditors. Contact details are provided in **Appendix A.**

16. Confidentiality, monitoring and data protection

16.1 We are committed to ensuring that this policy is applied fairly, consistently, and in a way that supports an inclusive, respectful, and legally compliant working environment including where digital systems and education technology (EdTech) are used.

16.2 Personal data, including special category data, may be collected, processed and stored where necessary to apply this policy. This will be done in accordance with our Data Protection Policy and applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018.

16.3 All personal data will be handled securely and in line with our Workforce Privacy Notice, Records Management and Retention Policy, and Information Security requirements.

16.4 Any actual or suspected loss, breach or compromise of personal data must be reported immediately to the Data Protection Officer to allow timely assessment, mitigation and, where required, notification to the Information Commissioner's Office.

16.5 Colleagues are expected to treat all personal and sensitive information with strict confidentiality, sharing it only where authorised and on a need-to-know basis. Failure to do so may be managed in line with our procedures.

16.6 Colleagues must ensure that all personal data and sensitive information they access in the course of their work whether in paper form, electronic systems, or EdTech platforms is treated with strict confidentiality. Such information should only be shared with authorised individuals on a need-to-know basis. Any suspected or actual breach of confidentiality must be reported immediately to the Data Protection Officer. Breaches may lead to disciplinary action in accordance with our procedures.

17. Review of policy

17.1 This policy will be reviewed annually, or earlier if there are changes in relevant legislation, statutory guidance, or internal practice.

17.2 We will monitor the application and impact of this policy to ensure it remains effective, equitable and aligned with our values.

Appendix A – Contacts

Chief Executive Officer	**Tracey Cleverly** E-mail: tcleverly@lapsw.org Tel: 01626 248800
Business Lead / Chief Finance Officer	**Emma Clark** E-mail: eclark@lapsw.org Tel: 01626 248800
Chair of Board	**Joanne Tisdall** E-mail: clerk@lapsw.org

Deputy Chief Executive Officer	**Emma Bone** E-mail: ebone@lapsw.org Tel: 01626 248800
People Lead	**Tara Henderson** Email: thenderson@lapsw.org Tel: 01626 248800
Whistleblowing Officer / Governance Professional	**Juliet Brodie** E-mail: partners@lapsw.org Tel: 01626 248800

Torquay Hub

Headteacher Ellacombe Church of England Academy	**Alison Helm** E-mail: ahelm@lapsw.org Tel: 01803 293040
Headteacher St Michaels Church of England Academy	**Julie Edwards** Email: jedwards@lapsw.org Tel: 01803 500971

Headteacher Ilsham Church of England Academy	**Jake Grinsill** E-mail: jgrinsill@lapsw.org Tel: 01803 292313
Headteacher Warberry Church of England Academy	**Steve Bone** E-mail: sbone@lapsw.org Tel: 01803 292642

South Devon Hub

Headteacher All Saints Marsh Church of England Academy	**Liam O'Sullivan** E-mail: losullivan@lapsw.org Tel: 01626 365293
Headteacher Dunsford Community Academy	**Liam O'Sullivan** Email: losullivan@lapsw.org Tel: 01626 572971

Headteacher Bovey Tracey Academy	**Louise Prywata** Email: lprywata@lapsw.org Tel: 01626 833257

South Hams Hub

Headteacher Charleton Church of England Academy	**Hannah Ruston** E-mail: hruston@lapsw.org Tel: 01548 312289

Headteacher Dartington Church of England Academy	**Katie Coombe** E-mail: kcoombe@lapsw.org Tel: 01803 862357

Headteacher Thurlestone Church of England Academy	**Hannah Ruston** E-mail: hruston@lapsw.org Tel: 01548 560494

Headteacher West Alvington Church of England Academy	**Hannah Ruston** E-mail: hruston@lapsw.org Tel: 01548 312290

West Devon Hub

Flourishing Schools Partner Gulworthy Primary Academy	**Charlotte Huish** E-mail: chuish@lapsw.org Tel: 01822 600650
Headteacher Lifton Community Academy	**Adam Hill** E-mail: ahill@lapsw.org Tel: 01566 232071

Flourishing Schools Partner Lamerton Church of England Academy	**Charlotte Huish** E-mail: chuish@lapsw.org Tel: 01822 613561
Headteacher St Andrews Church of England Academy	**Deborah Nunn** Email: dnunn@lapsw.org Tel: 01822 853153

Cornwall Hub

Headteacher Jacobstow Community Academy	**Michelle Jones** E-mail: mjones@lapsw.org Tel: 01840 230337
Headteacher St Marks Church of England Academy	**Michelle Jones** E-mail: mjones@lapsw.org Tel: 01840 230337

Headteacher Marhamchurch Church of England Academy	**Michelle Jones** E-mail: mjones@lapsw.org Tel: 01840 230337

Alumnis Hub

Headteacher Clawton Primary	Michelle Jones E-mail: mjones@lapsw.org Tel: 01409 253618
Headteacher St Helens Church of England Academy	Katie Kerr-Brown E-mail: kkerrbrown@lapsw.org Tel: 01237 475276

Headteacher Dolton Church of England Academy	**Katie Coombe** E-mail: kcoombe@lapsw.org Tel: 01805 804315
Headteacher The Clinton Church of England Academy	**Katie Coombe** E-mail: kcoombe@lapsw.org Tel: 01805 804315

External contacts

Trust's External Auditors	Thompson Jenner LLP Dave Tucker E-mail: davet@tjllp.com Tel: 01392 258553

Confidential Counselling Hotline	Schools Advisory Service (EAP) Email: counselling@uk-sas.co.uk Tel: 01773 814402

Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk

The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk