



LEARNING ACADEMY PARTNERSHIP Colleague Whistleblowing Policy

This policy supersedes all previous Colleague Whistleblowing policies

Policy Reference No	PT007
Review Frequency	Annually
Reviewed	September 2025
Next Review Date	Autumn 2026

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Amendments

Policy Date	New Version Number	Summary of change	Comments
Jan 24	V1.7	Contacts updated (Appendix A)	
Sep 24	V1.8	EDI statement added (3)	
Sep 24	V1.8	Contacts updated (Appendix A)	
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	
Mar 26	V2.0	Sexual Harassment added as a qualifying disclosure (6.1)	

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	

* *Trust* – Refers to all Schools, Academies & Business Support Team within the Learning Academy Partnership

* *Colleagues* – Refers to employees

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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 Trust People Team or your Head Teacher /Manager/Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate). We are committed to ensuring that all colleagues have access to our policies and can fully understand and engage with them and will work with you to provide the necessary support and resources.

2. Introduction

- 2.1 The Trust is committed to the highest possible standards of honesty and integrity, and we expect all colleagues to maintain these standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 2.2 This policy has been implemented following consultation with the recognised trade unions.
- 2.3 This policy does not form part of any colleague's contract of employment, and it may be amended at any time.

3. Scope and purpose

- 3.1 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,
- 3.2 This policy applies to all colleagues of the Trust, Trustees, Local committee members, consultants, contractors, casual and agency colleagues and volunteers (collectively referred to as colleagues in this policy).

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

- 4.1 As a Trust with diverse communities and workforce we recognise every individual for their uniqueness and aim to create an inclusive culture where people can be their genuine selves in accordance with our values. We believe we are 'stronger together' and will achieve our greatest success as an organisation when every person feels included and is able to flourish. We strive to create an environment where everyone, regardless of their background, feels valued, respected and empowered to contribute to their fullest potential.
- 4.2 We have zero tolerance for any behaviours that cause harm based on identities, backgrounds, cultures, neurodivergence, and/or protected characteristics, whether real or perceived. Identity-based harm, including but not limited to discrimination, harassment, microaggressions, hate speech, and violence, is unacceptable. Such behaviours are not only damaging to the individuals targeted but also undermine the values, integrity, and inclusive culture of our Trust.

- 4.3 We encourage all members of our Trust to report any incidents of harm based on identity, background, culture and or protected characteristics that they witness or experience. These reports will be handled sensitively, and witnesses will be supported throughout the process. The Trust will protect those who raise concerns in good faith from victimisation or retaliation.
- 4.4 We are all responsible for upholding this policy and contributing to a culture of respect and inclusion. Together, we can ensure that the Trust is a place where everyone feels valued, safe, and welcome.
5. These commitments are underpinned by our responsibilities under the Equality Act 2010, which protects individuals from unlawful discrimination and promotes equality of opportunity across all protected characteristics.

6. What is Whistleblowing?

- 6.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that wrongdoing or dangers at work. This may include:
- Criminal activity
 - Sexual Harassment
 - 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
 - The deliberate concealment of any of the above matters
- 6.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.
- 6.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.
- 6.4 If you are uncertain whether something is within the scope of this policy, you can seek advice from Trust's People Team.
- 6.5 If your concern is in relation to safeguarding and the welfare of young person, you should consider whether the matter is better raised under the Trust's Safeguarding and Child Protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in this policy may still apply.

7. Raising a Whistleblowing concern

- 7.1 We hope that you will be able to raise any concerns with your Head Teacher/Manager (as appropriate). You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- 7.2 However, if you feel that your Head Teacher/Manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with:
- Trust Governance Professional - has delegated responsibility managing whistleblowing complaints.
 - Chief Executive Officer
 - Trust Lead for People
 - The Chair of Board
- 7.3 Contact details are set out at the end of this policy (**Appendix A**).
- 7.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 7.5 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

8. Confidentiality

- 8.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 8.2 We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 7.2 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offers a confidential helpline. Their contact details are given at the end of this policy.
- 8.3 Where we receive anonymous complaints, we will decide about whether to investigate based on:
- The seriousness of the issue raised
 - The credibility of the concern
 - The likelihood of confirming the allegation from other sources
- 8.4 We will keep a central record of disclosures made under the Whistleblowing policy.

9. External disclosures

- 9.1 Our aim is to foster a culture of openness and integrity where colleagues feel confident and safe to raise concerns internally. We encourage all colleagues to use

the Trust's internal reporting routes in the first instance, as outlined in this policy, so that concerns can be addressed swiftly and appropriately within our organisation.

9.2 However, we acknowledge that in certain circumstances, you may feel it is necessary to make a disclosure to an external body. The law recognises that whistleblowers may make "qualifying disclosures" to prescribed external regulators, particularly if:

- You reasonably believe the information is substantially true,
- The concern falls under the remit of a regulator,
- Or you fear reprisal or inaction internally.

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

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

9.4 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).

9.5 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.

9.6 In the rare instance that your concern relates to a third party — such as a supplier, contractor, or partner organisation — and you reasonably believe the issue falls under their responsibility, you may raise the concern with them directly. However, we strongly encourage you to report such matters internally first so that we can provide advice and support.

9.7 Our priority is to ensure you feel protected and empowered to raise concerns safely - whether internally or externally. We will continue to support colleagues in making responsible disclosures that serve the public interest and uphold the integrity of the Trust

10. Wellbeing, Protection and Support for Whistleblowers

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

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

10.3 If you believe you have experienced any negative impact as a result of speaking up, please notify one of the contacts listed in Section 7.2 immediately. If the issue is not resolved informally, you may escalate it using the Trust's Grievance Procedure.

10.4 Anyone who retaliates against or seeks to intimidate a whistleblower will be subject to disciplinary action. Such behaviour is taken seriously, as it undermines the values and integrity of the Trust.

- 10.5 We are also mindful that those involved in whistleblowing processes - including the person raising the concern, those subject to it, and witnesses - may need emotional or psychological support. We offer access to a confidential counselling hotline (**see Appendix A**), and managers are encouraged to offer additional wellbeing support as appropriate.
- 10.6 Where a disclosure relates to identity-based harm or marginalisation, we will take steps to ensure those affected feel heard, validated, and supported throughout the process, using trauma-informed and culturally aware approaches.
- 10.7 Support is available throughout all stages of the process

11. Investigation and outcome

- 11.1 Once you have raised a concern, 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 the assessment, and we will keep you updated throughout the process
- 11.2 In some cases, we may appoint an investigator or team of investigators, who may include colleagues with specialist knowledge or relevant lived experience. All investigators will be expected to 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.
- 11.3 The investigator(s) will gather relevant information and may make recommendations to improve practice or prevent future harm. These findings will be shared with the Chief Executive Officer and Chair of the Board for consideration and any necessary actions.
- 11.4 Where your concern relates to identity-based harm (e.g. discrimination, microaggressions, or exclusion), we will take extra care to ensure:
- Psychological safety of those involved,
 - A trauma-informed and survivor-sensitive approach,
 - That investigators are appropriately trained or supported
- 11.5 While we may not be able to share every detail (particularly where confidentiality or legal constraints apply), we will aim to keep you informed of the progress and provide a clear summary of the outcome where possible.
- 11.6 If it is determined that a concern was raised in bad faith or with intent to cause harm, this may lead to disciplinary action, in line with our commitment to fairness and integrity. However, no action will be taken against individuals who raise genuine concerns, even if those concerns are not upheld.
- 11.7 We are committed to learning from every case to improve our culture of openness, safety, and accountability.

12. If you are not satisfied

- 12.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 12.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4.2. Alternatively, you may contact the Chair of Board or our external auditors. Contact details are set out at the end of this policy.

13. Confidentiality, monitoring and data protection

- 13.1 The Trust is committed to ensuring that this policy is applied fairly, consistently, and in a way that supports an inclusive, respectful, and legally compliant working environment.
- 13.2 As part of the implementation of this policy, the Trust may collect, process, and store personal data — including special categories of data — in accordance with our Data Protection Policy. This will always be done in line with current Data Protection legislation, including:
- The UK General Data Protection Regulation (UK GDPR)
 - The Data Protection Act 2018
 - Any successor legislation or updates to these laws
- 13.3 We will ensure that all data collected as part of the application of this policy is handled with integrity and in accordance with the principles of transparency, purpose limitation, and data minimisation. Records will be maintained in line with our:
- Workforce Privacy Notice
 - Records Management and Retention Policy
 - Information Security standards
- 13.4 If any colleague becomes aware that personal data is at risk of compromise, loss, or has been subject to a breach, they must report it immediately to the Trust's Data Protection Officer. Prompt reporting is essential to allow for assessment, mitigation, and, where applicable, notification to the Information Commissioner's Office (ICO) within the required 72-hour window.
- 13.5 Colleagues are responsible for familiarising themselves with and adhering to all related policies, including but not limited to:
- Data Protection and GDPR Policies
 - Criminal Records Information Policy
 - Recruitment and Safer Recruitment Policy
 - Internet, Email and Communications Policy
 - Information Security Policy
- 13.6 Colleagues must ensure that all personal data and sensitive information they access in the course of their work 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 Trust procedures.
- 13.7 These policies are available through the Colleague Portal, your Head Teacher, or the Trust Business Support Team.
- 13.8 By following these expectations, we ensure that data is handled responsibly and that the Trust remains a secure and trustworthy place for colleagues and the communities we serve.
- 13.9 If colleagues are ever unsure about their responsibilities or how to respond to a potential data issue, they are encouraged to seek advice from their line manager, the Trust Business Support Team, or the Data Protection Officer without delay.

14. Review of policy

- 14.1 This policy will be reviewed annually, or earlier if there are changes in relevant legislation, statutory guidance, or internal practice.
- 14.2 The Trust will monitor the application and outcomes of this policy to ensure it remains effective, equitable, and aligned with our Trust values.
- 14.3 Reviews will take into account feedback from colleagues, evolving best practice, and any identified gaps in fairness, inclusion, or consistency of application. Where appropriate, updates will be made to strengthen the policy and support continuous improvement across the Trust

Appendix A – Contacts

Whistleblowing Officer / Trust Governance Professional	Juliet Brodie E-mail: partners@lapsw.org Tel: 01 626 248800
Chief Executive Officer	Tracey Cleverly E-mail: tcleverly@lapsw.org Tel: 01 626 248800
Deputy Chief Executive Officer	Emma Bone E-mail: ebone@lapsw.org Tel: 01 626 248800
Trust Lead for Business / Chief Finance Officer	Emma Clark E-mail: eclark@lapsw.org Tel: 01 626 248800
Trust Lead for People	Tara Henderson E-mail: thenderson@lapsw.org Tel: 01 626 248800
Chair of Board	Joanne Tisdall E-mail: clerk@lapsw.org

Torquay Hub

Head Teacher Ellacombe Church of England Academy	Alison Helm E-mail: ahelm@lapsw.org
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Head Teacher Ilsham Church of England Academy	Jake Grinsill E-mail: jgrinsill@lapsw.org Tel: 01803 292313
Head Teacher St Michaels Church of England Academy	Julie Edwards Email: jedwards@lapsw.org Tel: 01803 500971
Head Teacher Warberry Church of England Academy	Steve Bone E-mail: stone@lapsw.org Tel: 01803 292642

South Devon Hub

Head Teacher All Saints Marsh Church of England Academy	Liam O'Sullivan E-mail: losullivan@lapsw.org Tel: 01626 365293
Head Teacher Bovey Tracey Academy	Louise Prywata Email: lprywata@lapsw.org Tel: 01626 833257
Head Teacher Dunsford Community Academy	Liam O'Sullivan E-mail: losullivan@lapsw.org Tel: 01626 572971

South Hams Hub

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	Hannah Ruston

Head Teacher Charleton Church of England Academy	E-mail: hruston@lapsw.org Tel: 01548 312289
Head Teacher Thurlestone Church of England Academy	Hannah Ruston E-mail: hruston@lapsw.org Tel: 01548 560494
Head Teacher West Alvington Church of England Academy	Hannah Ruston E-mail: hruston@lapsw.org Tel: 01548 312290

West Devon Hub

Executive Head Teacher Gulworthy Primary Academy	Melody Sterry E-mail: msterry@lapsw.org Tel: 01822 600650
Executive Head Teacher Lamerton Church of England Academy	Melody Sterry E-mail: msterry@lapsw.org Tel: 01822 613561
Head Teacher Liffon Community Academy	Adam Hill E-mail: ahill@lapsw.org Tel: 01566 232071
Head Teacher St Andrews Church of England Academy	Deborah Nunn Email: dnunn@lapsw.org Tel: 01822 853153

Cornwall Hub

Head Teacher Jacobstow Community Academy	Michelle Jones E-mail: mjones@lapsw.org Tel: 01840 230337
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Head Teacher Marhamchurch Church of England Academy	Deirdre Petersen E-mail: dpetersen@lapsw.org Tel: 01288 361445
Head Teacher St Marks Church of England Academy	Deirdre Petersen E-mail: dpetersen@lapsw.org Tel: 01288 361445

External contacts

Trust's External Auditors	Thompson Jenner LLP Dave Tucker E-mail: davet@tjllp.com Tel: 01392 258553
Confidential Counselling Hotline	Health Assured (EAP) Tel: 0800 028 0199
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