

# Whistleblowing Policy

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### Appendix 1 Whistleblowing Process

## 1. Definitions

- 1.1 **DEMAT** means the Diocese of Ely Multi-Academy Trust.
- 1.2 **Academy** means a constituent academy of DEMAT.
- 1.3 **Central Team** means staff who are not employed within an academy.
- 1.4 **Central Leadership Team** means any Director or Head of a Function in the Central Team other than the Director of Education, and the CEO.
- 1.5 **CEO** means the Chief Executive Officer of DEMAT, or any officer or other person exercising relevant authority delegated by the Chief Executive Officer to them.
- 1.6 **Senior Manager** means a Senior manager within the academies or a Hub Director or Senior Manager within the Central Team.
- 1.7 **Line Managers** refers to those with line management responsibilities including but not limited to Hub Directors, Head of Department and Headteachers.
- 1.8 **Staff** means any person employed by DEMAT, temporarily or permanently.
- 1.9 **Employee** means any person employed by DEMAT, temporarily or permanently.
- 1.10 **Worker** means any person who meets the legal definition of a 'worker' and volunteers. Volunteers however are not generally protected by Statutory Whistleblowing legislation.
- 1.11 **Companion** refers to a person chosen by the employee to accompany them, who shall be a trade union representative or a workplace colleague.

## 2. Application of this Policy

- 2.1 This policy applies to all employees of DEMAT based either in schools or within the central team, volunteers, and workers such as contractors, casual workers and agency workers.
- 2.2 This policy does not form part of any employee's Contract of Employment, and it may be amended at any time following consultation with recognised unions.

## 3. Relationship with DEMAT Values

- 3.1 The application of this policy must be applied at all times in a way that reflects the values of DEMAT:
  - Love – We engender love and tolerance between and for our staff, pupils and others to foster an inspiring atmosphere of mutual support.

Community – We are committed to ensuring our schools are a living part of the community and contribute positively to its needs.

Respect – We do everything to provide a caring, safe and secure place for our staff and pupils to be happy and respected in our schools so they may achieve their potential.

Trust – We acknowledge accountability and responsibility for our actions and ensure that we encourage each other to make brave decisions and then learn from any mistakes.

Ambition – We are determined that our schools offer a place for the joy of learning, enabling those of all abilities to thrive and go on to lead rewarding lives

This is further defined in the four key strands of DEMAT, all of which are underpinned by our Christian distinctiveness,

Children are at the heart of all we do

Keep close to the work

Maintaining a legacy, creating new traditions

Aspirational, yet sustainable

## 4. Associated Policies and Documents

4.1 This Policy/Procedure should be read in conjunction with the whistleblowing guidance found at <https://www.gov.uk/whistleblowing> and the following DEMAT Policies/Procedures:

- Safeguarding and Child Protection
- Colleague Code of Conduct
- Grievance Policy
- Bullying and Harassment Policy
- Health and Safety Policy

4.2 DEMAT HR policies can be accessed via our website at: <https://demat.org.uk/policies>

## 5. Version control

<b>No.</b>	<b>Status of document/changes</b>	<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Date of approval</b>
4	Policy incorporated into new format & Minor changes to align to W/B Poster	HF	HRO	AB	16.09.24
5.	Revised procedure to simply and provide clarity.  Introduction of inbox for whistleblowing disclosures about the CEO.	HF	HRO	Trust Board	Oct 2025

5	Updated in line with Statutory changes (sexual harassment becoming a qualifying disclosure)	HF			May 2026
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This document will be reviewed on annual basis.

For all questions in relation to this policy, please contact the HR Team on [hrteam@demat.org.uk](mailto:hrteam@demat.org.uk)

## 6 Purpose and Scope

6.1. The purpose of this policy is to set a framework for the following:

- to communicate the procedure for dealing with concerns raised by employees which relate to suspected wrongdoing or dangers at work.
- To highlight the avenues for employees to raise concerns internally as a matter of course and receive feedback on any action taken.
- provide for matters to be dealt with quickly and appropriately; and ensure that concerns are taken seriously and treated consistently and fairly.
- reassure employees that they will be protected from reprisals or victimisation for whistleblowing where there is a genuine concern and there is a reasonable belief that the concern has been raised in good faith.
- allow employees to take the matter further if they are dissatisfied with the response

6.2 Any safeguarding allegations against staff and volunteers are to be dealt with in accordance with the DfE 'Keeping Children Safe in Education' statutory guidance and DEMAT's policies on Managing Allegations against Staff and/or Low-Level Concerns.

6.3 Parents who have concerns are encouraged to raise these via the Complaints Procedure. The Complaints Procedure can be found at <https://www.demat.org.uk/policies>.

## 7. Policy Statement

7.1 The Trust is committed to the highest possible standard of operation, probity and accountability. Openness and the ability to speak up is an important part of our culture. All employees, volunteers, contractors, casual workers and agency workers with serious concerns are encouraged to come forward and voice those concerns. Concerns will be taken seriously and dealt with promptly.

7.2 Employees are often the first to realise there may be something wrong within their place of work and it is important they feel able to express their concerns without fear of harassment or victimisation, otherwise they may find it easier to ignore the concern rather than report it.

7.3 The earlier an employee expresses the concern, the easier it is to act. Although an employee is not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for the concern.

7.3 The Public Interest Disclosure Act 1998 recognises this fact and is designed to protect employees, who make certain disclosures of information in 'the public interest', from detriment and/or dismissal. This policy builds on the provisions of the Act.

7.4 This policy document makes it clear that those raising concerns can do so without fear of reprisals; it is intended to encourage and enable employees to raise serious concerns within the Trust rather than overlooking a problem or alerting anyone external to the school.

## 8. What is whistleblowing?

8.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work in the public interest. The disclosure may include any of the following:

- criminal activity
- miscarriages of justice
- sexual harassment
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- bribery
- the deliberate concealment of any of the above matters.

8.2 The Trust will also consider complaints regarding the following in accordance with this policy:

- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures
- unauthorised disclosure of confidential information
- conduct likely to damage our reputation
- public examination and assessment fraud

8.3 Where concerns relate to personal circumstances in the workplace, it may be more appropriate for these to be resolved under a different policy such as the grievance policy. Regardless of the policy in which the concern is managed, it will be taken seriously and dealt with in a sensitive and timely manner.

8.4 A 'Whistleblower' is a person who raises a genuine concern relating to the matters listed above and it is in the public interest. If employees have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) they should report it under this policy.

8.5 The Trust recognises the decision to report a concern can be a difficult one to make, but it is important we are made aware of any concerns and can take appropriate action. The Trust will not tolerate harassment or victimisation and will take action to protect employees when they have a genuine concern.

8.6 This does not mean that if an employee is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of the employee raising a concern under the whistleblowing policy.

## 9. Roles and Responsibilities

9.1 The roles and responsibilities which apply in relation to this policy include but is not limited to:

**9.1.1 Trustees** are responsible for the monitoring the implementation and effectiveness of this policy. A status report will be provided to the Personnel Committee and an annual report in conjunction with the policy for ratification will be provided to the Board of Trustees by the Lead Trustee. The lead role will ensure appropriate actions are taken in response to learning. Any whistleblowing concerns about the CEO should be sent to [CEOwhistleblowing@demat.org.uk](mailto:CEOwhistleblowing@demat.org.uk) which is accessible to the Chair of Trust Board and the Chair of the People and Culture Committee.

#### **9.1.2 Chief Executive Officer**

- Overall responsibility and accountability for the management of whistleblowing concerns;
- Promote and provide a safe culture and environment where employees and other workers are confident that they can speak up and raise concerns without fear of reprisal and with confidence they will be listened to and supported;
- Delegate the role to investigate matters to an appropriate member of the Central Leadership Team or appropriate Line Manager.

#### **9.1.3 Central Leadership Team**

On the chief executive's behalf, Senior Managers/Directors may be responsible for:

- managing whistleblowing concerns and the way the organisation learns from them;
- overseeing the implementation of actions required as a result of a concern being raised;
- investigating concerns, and/or;
- deputising for the chief executive on occasion;

#### **9.1.4 Headteacher/Line Manager**

- Provide a safe environment where employees and other workers are confident that they can speak up and raise matters of concern;
- Ensure that any matters raised are treated seriously and dealt with promptly in accordance with this policy and procedure;
- Inform appropriate senior managers and, where appropriate, Chair of Governors of concerns reported under this policy and procedure;
- Maintain confidentiality, as appropriate, of the employee(s) involved in the concern;
- Ensure that anyone who raises a concern using this policy and procedure is supported and does not suffer any unfair or negative treatment as a result;
- Deter and take appropriate action against bullying, isolating or victimisation of anyone using these procedures.

#### **9.1.5 Employees**

- Report and pursue concerns reasonably believed to be in the public interest;
- Raise concerns to the appropriate person in the appropriate way in line with this policy;
- Not raise or pursue any malicious or vexatious allegations relating to the Trust, academy or colleagues;
- Ask questions and seek clarification on issues which are of day-to-day concern.

- Whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, employees must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.

## 10 Confidentiality

- 10.1 All concerns will be treated in confidence and disclosed on a need-to-know basis. If requested, every effort will be made not to reveal the identity of the employee raising the allegation(s). If we are not able to resolve the concern without revealing the identity of the employee this will be discussed prior to disclosure.

## 11 Anonymous Allegations

- 11.1 Employees are encouraged to put their name to an allegation. Proper investigation may be more difficult or impossible if we cannot obtain further information, and it is also more difficult to establish whether allegations are credible when complaints are anonymised.
- 11.2 Anonymous allegations will be considered at the discretion of the Trust. In exercising discretion, the following factors will be considered:
- the seriousness of the issues raised;
  - the credibility of the concern;
  - the likelihood of confirming the allegation from attributable sources;

## 12 Untrue Allegations

- 12.1 If an employee makes an allegation where they have a genuine concern, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, we conclude that an employee has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that employee, following an appropriate investigation.

## 13 Unfounded Allegations

- 13.1 Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the employee who raised the concern, who will be informed that the Trust deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

## 14 Support for Employees

- 14.1 It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate to both the employee(s) raising the concerns and any employee(s) subject to investigation.
- 14.2 Support is also available via our Employee Assistance Programme, who can be contacted via the following methods:

<https://www.employeeassistance.org.uk>

Access using the code 'diocese'

24/7 freephone: 0800 328 1437

From outside the UK: +44 (0) 1482 661814

Minicom: 01482 661 911 (08:30 – 18:00)

- 14.3 The HR department and union representatives may also be contacted for support.

## 15 Procedure

### 15.1 How to raise a concern

As a first step, an employee should normally raise concerns with their immediate line manager or line manager's superior. This depends, however, on the seriousness and sensitivity of the issues and who is involved. If the employee feels unable to raise the matter within the management structure or management are involved in the concern(s), the employee may contact the Trust whistleblowing number on 07958 059403 or email [whistleblowing@demat.org.uk](mailto:whistleblowing@demat.org.uk). In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf.

- 15.2 Concerns may be raised verbally by telephone or in person, or in writing. It is important that however the matter is raised, the employee makes it clear they are raising the issue via the whistleblowing policy.
- 15.3 When raising the concern in writing, the employee should set out the background and history of the concerns, giving names, dates and places where possible, and the reasons why they are particularly concerned about the situation. If raising the issue verbally, notes may be taken, and the employee may be asked to provide a written account following the initial discussion. This is to ensure we are clear on what the issues are and can take the most appropriate action.
- 15.4 Once details of the concern have been received, consideration will be given to whether it may constitute whistleblowing that warrants the issues to be dealt with under this policy and procedure. If it is not deemed as whistleblowing, the employee will be advised and provided with information regarding other procedures that may apply.
- 15.5 It should be noted that where concerns are raised directly with the Line Manager or Senior Manager (for example, a Hub Director), they will report the matter to, and may be supported by the HR team, or another team, as appropriate (for example, safeguarding) to ensure this policy is adhered to.
- 15.6 If the matter is deemed to fall under whistleblowing (or if more information is required to reach a decision), a designated Senior Manager will meet with the employee within 5 working days of the concern being received. The employee may be accompanied at this meeting by a Trade Union Official or Work Colleague. The employee will be advised of the process to be followed and can raise any questions. This meeting is not an investigation meeting, but a note-taker may be present, particularly if the employee is yet to confirm the concerns in writing. Any notes taken will be shared with the employee and they will be asked to confirm the notes are an accurate representation of the meeting.

## 15.7 What will the Trust do?

In some cases, it may be possible to resolve the concern(s), by agreed action or an explanation regarding the concern(s), without the need for further investigation. Or the Senior Manager leading the meeting may consult with other relevant parties within the Trust, such as the Headteacher, Hub Director and HR Representative to determine whether an Internal investigation is appropriate, and if so, what form it should take and who would be the most appropriate person to carry out any such investigation. A record should be made of the decisions and/or agreed actions.

15.8 Depending on the nature of the concern(s) it may be necessary for the concern(s) to:

- be referred to the police or other authorities
- be referred to the external auditor;
- form the subject of an independent inquiry;

15.9 Within ten working days of the meeting (section 15.6), the employee will be written to:

- acknowledging that the concern has been received;
- indicating how the Trust proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response
- inform the employee whether any initial enquiries have been made
- inform the employee whether further investigations will take place, and if not, why not; and/or
- inform the employee when they will receive further details if the situation is not yet resolved.

15.10 If an investigation is required, the employee may be invited to attend a further meeting (investigation meeting). They may be accompanied by a Trade Union Official or Workplace colleague at this meeting.

15.11 We understand the employee will need to be assured that the disclosure has been properly addressed. Unless there are legal reasons why this cannot be done, the employee will be kept informed of progress and outcome of any investigation. It is however important to note that some information may not be able to be disclosed due to confidentiality of other parties.

## 16 Raising concerns outside the Trust

16.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. However, the law recognises that in some circumstances it may be appropriate for the employee to report their concerns to an external body such as a regulator. If an employee is not satisfied with the Trust's response, the manager should ensure that they are made aware with whom they may raise the matter externally, which could be:

- 'Protect' \* (tel no: 020 3117 2520)
- Recognised Trade Union
- Senior LA Officer
- External Auditor
- Relevant professional bodies or regulatory organisations
- Solicitor

16.2 The manager should stress to the employee that if they choose to take a concern outside the Trust, it is the employee's responsibility to ensure that confidential information is not disclosed to a third party.

16.3 Concerns about safeguarding practices can be raised externally using the NSPCC whistleblowing helpline. Employees can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

\*Protect is a registered charity that employees can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns.

## Appendix 1 - Whistleblowing process

### What is Whistleblowing?

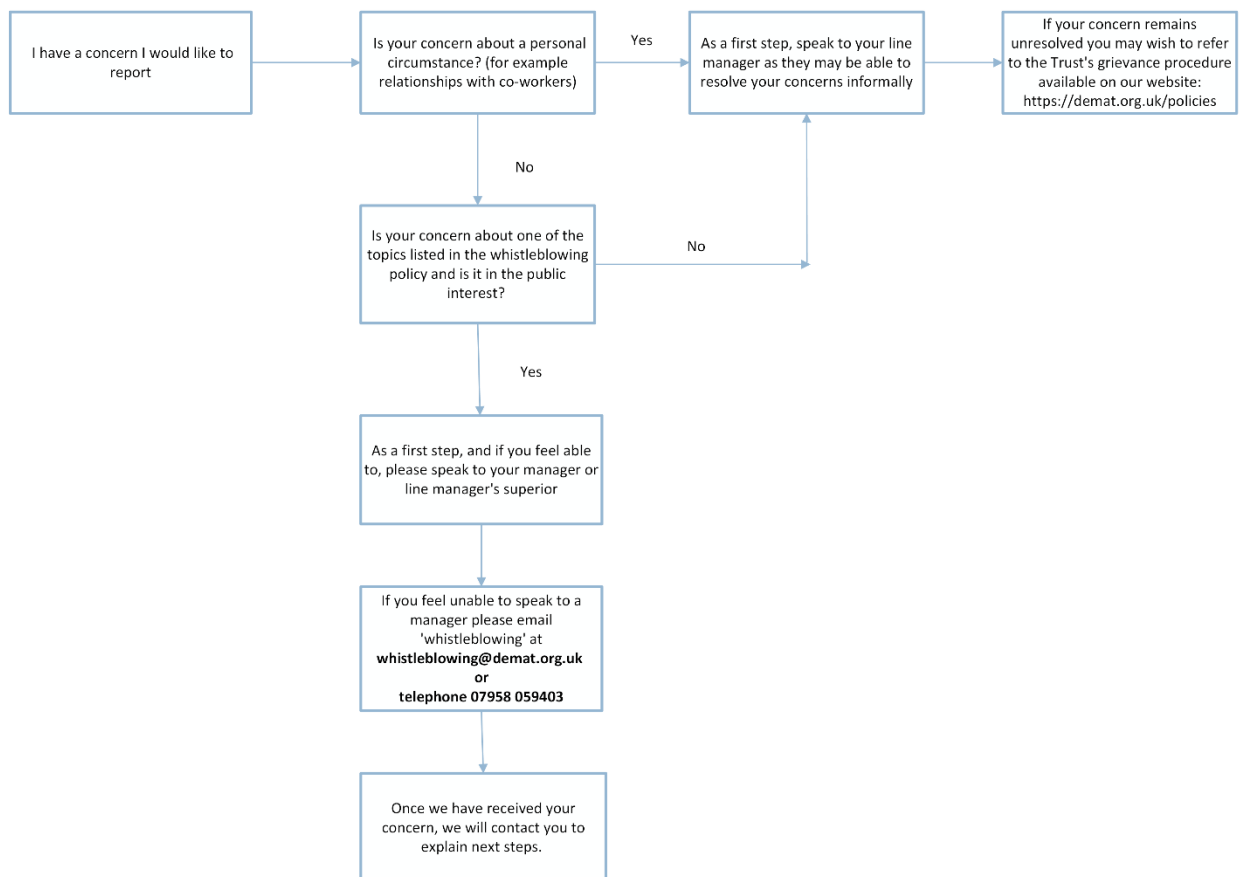
Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work, and which is in the public interest. The wrongdoing you disclose must be in good faith. Some examples of wrongdoing include criminal activity, dangers to health and safety, failure to comply with any legal requirements, bribery, fraud, and miscarriages of justice. This means it must affect others. A full list of examples is documented in the Whistleblowing Policy, available at: <https://demat.org.uk/policies/>

### Will I be affected if I raise a concern?

As a Whistleblower you're protected by the Public Interest Disclosure Act (1998). This means you should not be treated unfairly or lose your job because you 'blow the whistle'.

### How do I report a concern?

Employees are encouraged to raise concern; please follow the steps below to ensure you raise your concern through the appropriate process:



**Give us a chance to put it right: get in touch.**

