
GMAT Whistleblowing Procedure

Reporting illegal or improper conduct (disclosures under the public interest disclosures Act 1998) or concerns about safeguarding children and young people

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1. Introduction

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Trust to voice those concerns and feel secure in doing so.

It is important that any fraud, misconduct or wrongdoing is reported and properly dealt with. The Trust encourages all individuals to raise any concerns they may have about the conduct of others or the way in which the Trust is run.

The Trust is committed to the principles of honesty and integrity. A culture of openness and accountability is critical to ensuring these values are authentically lived by.

This policy applies to all employees, workers, agency staff, contractors, service providers, volunteers, trustees, and any other officers of the Trust.

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

2. Scope

If your concern relates to how you have been treated this should be raised under the grievance or bullying and harassment policies.

The whistleblowing policy will not replace any existing policies or procedures. If misconduct is discovered as a result of any investigation under this policy the Trust's disciplinary policy will be used.

The Trust encourages individuals to disclose any concerns they may have regardless of whether they are covered by this or another policy.

3. What is Whistleblowing?

Whistleblowing means the reporting of information which relates to actual or suspected wrongdoing related to a "qualifying disclosure".

A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- Criminal offences, such as fraud or corruption
- Students' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

It is not necessary for a whistleblower to have proof of such an act for the protections of this policy to apply. They must only have a reasonable belief.

Potential whistleblowers should have reasonable grounds for believing the information they are disclosing is accurate.

Where a disclosure fails to show that one of the categories of wrongdoing has been or is likely to be occur, it cannot amount to a qualifying disclosure for the purposes of the whistleblowing legislation.

Potential whistleblowers are encouraged to seek support from a senior manager, the Trust's HR team, or their trade union representative if they are unsure whether to make a disclosure or to access support in making a disclosure, regardless of whether it is qualifying or not.

4. Protections for Whistleblowers

This policy has been written to take account of the Part IVA of the Employment Rights Act 1996 which protects workers making protected disclosures.

A qualifying disclosure made to the worker's employer is a protected disclosure. A qualifying disclosure made by a worker under this policy will also be a protected disclosure.

A whistleblower who makes a qualifying disclosure has the right not to be dismissed, subjected to any other detrimental detriment, or victimised, because they have made a disclosure.

Dismissing, or subjecting a whistleblower to any other detriment for raising a protected disclosure, such as demotion, or harassment or sexual harassment or victimisation (under the Worker Protection Act 2024) will be a disciplinary offence.

The Trust will not dismiss anyone or determine anyone should cease to work at the Trust, on the basis that they have made an appropriate lawful disclosure in accordance with the law and this policy.

It should be noted that if a concern is reported directly to the media, in most cases the individual will lose their legal whistleblowing rights.

Whistleblowers may seek support and advice from organisations such as the whistle blowing charity Protect (<https://protect-advice.org.uk> / 020 3117 2520) or ACAS (www.acas.org.uk).

5. Obligations for the Whistleblower

An instruction to cover up wrongdoing is in itself a disciplinary offence. A whistleblower who is told not to raise or pursue any concern, even by a person in authority, should not agree to remain silent.

Whistleblowing to an external agency without first using the procedure below may be considered a breach of the Trust's Code of Conduct.

It is not appropriate to whistle blow to the media in any circumstances and may be considered gross misconduct.

Maliciously making a false allegation is a disciplinary offence.

6. Confidentiality and Data Protection

The Trust encourages individuals to voice their concerns openly. If anyone wishes to raise concerns confidentially, the Trust will make every effort to keep their identity secret.

The Trust will consult with the whistleblower before divulging their identity to any party, including an investigator.

The Trust does not encourage anonymous disclosures as this may make it harder to establish the credibility of an allegation and may make investigation difficult or impossible. Anonymous concerns will be taken seriously and investigated as far as is possible under this policy.

The Trust will process any personal data collected in accordance with its data protection policy and will only be disclosed to relevant individuals for the purposes of dealing with the disclosure. All documents linked to the concern and subsequent investigations will be stored and retained in line with data protection regulations. All individuals engaged in dealing with the concern are expected to treat the matter with the strictest of confidence and the same standards of confidentiality are expected from the individual raising the concern.

7. The Trust's Commitment and Obligations

Any matter raised under this policy and procedure will be investigated thoroughly, promptly and confidentially.

Whilst the trust will aim to keep the employee informed of the progress of the investigation and likely timescales, sometimes the requirement for confidentiality will prevent full information about the investigation and any consequential disciplinary action from being disclosed.

Concerns regarding financial irregularity will be reported to the Trust's auditors and ESFA; where concerns related to child protection these will be handled in keeping with the relevant policy of the school and reported to the Local Authority Designated Officer (LADO) where the threshold is met.

8. Whistleblowing Procedure

Stage 1 – Disclosure

The whistleblower should initially raise their concern to the CEO, Safeguarding Lead or their Principal. They may do this orally or in writing.

If the concern relates to the Principal, the whistleblower should raise this with the CEO.

If the concern relates to the CEO, the whistleblower should raise this with the Chair of Trustees.

Concerns are best raised in writing. This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation. An individual, however, who does not feel able to put their concerns in writing can telephone or meet with the appropriate senior member of staff. It is likely that following such conversations, the individual will be asked to provide their concerns in writing.

Employees may invite a colleague or their trade union to raise a matter in conjunction with them.

Stage 2 – Investigation

The Trust will arrange an investigation into the concerns raised. This will take place as soon as is reasonably practicable.

The investigation may involve the whistleblower and other individuals involved meeting with the investigator and giving a written statement.

At any investigatory meetings the whistleblower is entitled to be accompanied by a recognised trade union representative or a work colleague.

Step 3 – Report to Trustees

The investigator will report to the Board of Trustees before any further action is taken. The board will decide on potential outcomes including, but not limited to:

- Invoking the Trust’s disciplinary process, or other relevant policy
- Referral to the police, government department or regulatory agency
- No further action

On conclusion of any investigation, the whistleblower will, as far as is practicable and where it is reasonable to do so, be told the outcome of the investigation and what the Trust has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

As per the requirement under the Academies Financial Handbook, the Board of trustees will notify the Education and Skills Funding Agency (ESFA) as soon as possible, of any instances of fraud, theft and/or irregularity exceeding £5k individually, or £5k cumulatively in any financial year. Unusual or systematic fraud, regardless of value, must also be reported.

Step 4 – Escalation

If, on conclusion of stages 1, 2 and 3 the whistleblower reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of proscribed bodies to which qualifying disclosures may be made.

These include:

- The Financial Conduct Authority (formerly the Financial Services Authority)
- The Health and Safety Executive
- The Environment Agency
- His Majesty’s Chief Inspector of Children’s services and skills
- The Secretary of State for Education
- The Office of Qualifications and Examinations Regulator
- The Equality and Human Rights Commission
- LADO

9. Contacts

The Trust’s appointed Trustee(s) for this purpose is Chair of Trustees.

The Trust’s appointed member(s) of staff for this purpose are:

- CEO

- Principal, Goffs and Churchgate
- Executive Principal, Primary Phase
- Associate Principal, Flamstead End

The independent whistleblowing charity Protect; [Protect - Speak up stop harm - Whistleblowing Homepage](#)

Helpline [020 3117 2520](tel:02031172520), Webform: [Contact Our Advisors](#)

Ofsted Whistleblowing Hotline: 0300 123 3155 or email: whistleblowing@ofsted.gov.uk

Local Authority Designated Officer (LADO); 0300 123 4043.

NSPCC whistleblowing advice line – 0800 028 0285 8am – 8pm Monday – Friday and at weekend 9am – 6pm. Email: help@nspcc.org.uk.

Alternatively, you can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.