Whistleblowing Policy

Policy Owner:	**Head of Governance**
Approved by:	**Trust Board**
Last reviewed:	**September 2026**
Next review due by:	**September 2027**

Due to the evolving nature of The CAM Academy Trust, procedures behind this policy will be reviewed and amended accordingly to reflect changes.

At the heart of our work lie the six core principles of The CAM Academy Trust. These drive everything that we do.



Definitions

The term “principal” also refers, where appropriate, to any other title used to identify the principal, and to the appropriate Director in regards to centrally employed staff.

The term “employee” refers to any member of The CAM Academy Trust staff.

The term “senior manager” refers to any member of the Leadership Group, as defined by the School Teachers’ Pay and Conditions Document, or a senior support employee in cases involving support staff.

Purpose

To set out the Trust Board's policy and procedure for dealing with concerns raised by employees which relate to suspected wrongdoing or dangers at work. Allegations of child abuse against teachers and other staff and volunteers are to be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges. The policy also includes a specific section related to examinations.

Background

As employees are often the first to realise that there may be something wrong within the school, it is important that 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. 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.

The Trust Board is committed to the highest possible standard of operation, probity and accountability. In line with that commitment, employees, consultants, contractors, volunteers, casual workers and agency workers with serious concerns are encouraged to come forward and voice those concerns. This policy document makes it clear that employees can do so without fear of reprisals; it is intended to encourage and enable employees to raise serious concerns within the school rather than overlooking a problem or alerting anyone external to the Trust.

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

Child Protection / Safeguarding concerns

Concerns related to Child protection and Safeguarding concerns will generally fall within the Child Protection and Safeguarding Policy.

That policy notes:

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, this should be reported to the principal/Head of School. If the concerns/allegations are about the principal/Head of School, this should be reported to the appropriate phase director who will ensure that the designated officer at the local authority (LADO) is informed.

If the concerns/allegations are about a member of the central trust team, this should be reported to the CEO. If concerns/allegations are about the CEO, these should be reported to the Chair of the trustees via governance@catrust.co.uk .

Please refer to the full policy for more information.

Aims of the policy

This policy aims to:

- provide 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 whistle- blowing where they have a genuine concern;
- allow employees to take the matter further if they are dissatisfied with the Trust Board's response.

Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook 2025

This policy has been written in line with the above document, as well as government guidance on whistleblowing We also take into account the Public Interest Disclosure Act 1998.

This policy complies with our funding agreement and articles of association.

Definition of Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Employees are protected by law if they report any of the following:

- a criminal offence, for example fraud or corruption
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- failure to comply with a legal obligation or statutory requirement
- breachers of financial management procedures
- attempts to cover up the above, or any other wrongdoing in the public interest

Appendix A provides further examples for clarification.

A **whistleblower** is a person who raises a genuine concern relating to the matters above. 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.

Before initiating the procedure, employees should consider the following:

- the responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees;
- employees should use line manager or team meetings and other opportunities to raise 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.

This policy should not be used for complaints about an employee's personal circumstances, such as the way they have been treated at work. In these cases, an employee should use the Trust's Grievance Procedure (or anti-harassment and bullying policy as appropriate); if the matter relates to salary, the salary review procedures documented in the Trust's Pay policy.

Safeguards

Harassment or victimisation

The Trust Board recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Trust Board will not tolerate harassment or victimisation and will take action to protect employees when they have a genuine concern.

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 that employee raising a concern under the whistleblowing policy.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. The Trust Board will make every effort to protect an employee's identity however there may be a legal requirement to disclose the identity of the employee.

As indicated above, identity will be protected as far as possible but should the investigation into the concern require the employee to be named as the source of the information, this will be discussed with the employee before their name is disclosed.

Anonymous allegations

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. Anonymous allegations can also make qualifying for legal protection as a whistleblower more difficult. Anonymous allegations will be considered at the discretion of the Trust Board. In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue allegations

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.

Unfounded allegations

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 Board deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

Support to employees

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. There is a free 24-hour confidential employee counselling service provided by Zurich Municipal on 0117 9342121.

How to raise a concern

As a first step, an employee should normally raise concerns with the Head of Governance. This depends, however, on the seriousness and sensitivity of the issues and who is involved. For example, if an employee believes that the Head of Governance is engaged in improper action then the matter should be referred to the Chair of the Trust Board. An employee (including the principal and members of the leadership team) can by-pass the direct management line and the Chair of the Trust Board if they feel the overall management and governance of the Trust is engaged in an improper course of action.

Concerns are better raised in writing and sent to the Head of Governance via email (governance@catrust.co.uk) or post:

Head of Governance, The CAM Academy Trust, Sheepfold Lane, Cambourne, CB23 6FR

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 an employee does not feel able to put the concern in writing, they should telephone or meet the appropriate person. It is important that, however the concern is raised, the employee makes it clear that they are raising the issue via the whistle-blowing procedure.

The earlier an employee expresses the concern, the easier it is to take action.

Although an employee is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf.

At each meeting under this policy the employee may bring a colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

The role of the Head of Governance

The Head of Governance may be informed by an employee about concern(s) and that they are "blowing the whistle" within the procedure in person; or in writing or over the phone.

The Head of Governance should respond immediately and where the threshold has been met, arrange to meet with the employee, alongside an appropriate member of the trust People team to discuss the concern(s) as soon as possible.

When deciding if the threshold has been met, the Head of Governance will take into consideration whether the following criteria are applicable:

- a criminal offence, for example fraud or corruption
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- failure to comply with a legal obligation or statutory requirement
- breachers of financial management procedures
- attempts to cover up the above, or any other wrongdoing in the public interest

If threshold is not met the Head of Governance will advise the employee of such and the alternative options which present, which may include access to the grievance policy.

Stage One:

At the initial meeting the Head of Governance should establish that:

- there is genuine cause and sufficient grounds for the concern; and
- the concern has been appropriately raised via the Whistle-blowing Policy.

The Head of Governance should ask the employee to put their concerns in writing, if they have not already done so. If the employee is unable to do this the Head of Governance will take down a written summary of their concern/s and provide them with a copy after the meeting.

The Head of Governance should make notes of the discussions with the employee. The employee's letter and/or the Head of Governance's notes should make it clear that the employee is raising the issue via the whistle-blowing procedure and provide:

- the background and history of the concerns; and
- names, dates and places (where possible); and
- the reasons why the employee is particularly concerned about the situation.

The employee should be asked to date and sign their letter and/or the notes of any discussion. The Head of Governance should positively encourage the employee to do this, as a concern

expressed anonymously is much less powerful and much more difficult to address, especially if the letter/notes become evidence in other proceedings, e.g. an internal disciplinary hearing.

The Head of Governance should follow the policy as set out above and in particular explain to the employee:

- who they will need to speak to in order to determine the next steps (e.g. Chief Executive Officer or Chair of the Trust Board);
- what steps they intend to take to address the concern;
- how they will communicate with the employee during and at the end of the process. It should be noted that the need for confidentiality may prevent the school giving the employee specific details of any necessary investigation or any necessary disciplinary action taken as a result;
- that the employee will receive a written response within **ten working days**;
- that their identity will be protected as far as possible, but should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed;
- that the Trust will do all that it can to protect the employee from discrimination and/or victimisation;
- that the matter will be taken seriously and investigated immediately;
- that if the employee's concern, though raised as a genuine concern, is not confirmed by the investigation, no punitive action will be taken against them;
- if clear evidence is uncovered during the investigation that they have made a malicious or vexatious allegation, disciplinary action may be taken against them; and
- the investigation may confirm their allegations to be unfounded in which case the Trust will deem the matter to be concluded unless new evidence becomes available.

Stage Two:

Following the initial meeting with the employee, the Head of Governance should consult with the Chief Executive Officer or Chair of the Trust Board to determine whether an investigation is appropriate and, if so, what form it should take. A record should be made of the decisions and/or agreed actions.

It may be necessary, with anonymous allegations, to consider whether it is possible to take any further action. When making this decision, the Head of Governance should take the following factors into account:

- the seriousness of the issue(s) raised;
- the credibility of the concern(s); and
- the likelihood of confirming the allegation(s) from attributable sources.

In some cases, it may be possible to resolve the concern(s) simply, by agreed action or an explanation regarding the concern(s), without the need for further investigation. However, depending on the nature of the concern(s) it may be necessary for the concern(s) to:

- be investigated internally;
- be referred to the police;
- be referred to the external auditor;
- form the subject of an independent inquiry.

The Head of Governance should have a working knowledge and understanding of other Trust policies and procedures in addition to receiving support from the Trust Head of People, e.g. grievance, disciplinary, harassment, child protection procedures, to ensure that concerns raised by employees are addressed via the appropriate procedure/process.

Stage Three:

Within **ten working days** of a concern being received, the Head of Governance receiving the concern must write to the employee:

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

Raising concerns outside the school or trust

The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. 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. It will very rarely, if ever, be appropriate to alert the media. Employees are strongly encouraged to seek advice before reporting a concern to anyone external. If an employee is not satisfied with the Trust's response, the Head of Governance should ensure that they are made aware with whom they may raise the matter externally:

- Protect* (previously known as Public Concern at Work) https://protect- advice.org.uk/homepage/ Tel no: 020 3117 2520
- Recognised Trade Union;
- Senior Local Authority Officer;
- External Auditor;
- Relevant professional bodies or regulatory organisations;
- Solicitor.

**Protect (previously known as Public Concern at Work) 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.*

The Head of Governance should stress to the employee that if they choose to take a concern outside the school / Trust, it is the employee's responsibility to ensure that confidential information is not disclosed, i.e. confidential information, in whatever format, is not handed over to a third party.

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

Whistleblowing in relation to exams

Whistleblowing at all Trust examination centres is encouraged, not penalised, and staff are made aware that they have a duty to report any concerns they have about the conduct of examinations.

The head of centre at each school aims to create and maintain an approach to examinations that reflects an ethical culture and encourages staff and students to be aware of and report practices that could compromise the integrity and security of examinations.

In compliance with section 5.11 of the JCQ's General Regulations for Approved Centres, each examination centre within the Trust will:

- take all reasonable steps to prevent the occurrence of any malpractice (which includes maladministration) before, during and after assessments have taken place
- inform the awarding body **immediately** of any alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, by completing the appropriate documentation
- as required by an awarding body, gather evidence of any instances of alleged or suspected malpractice (which includes maladministration) in accordance with the JCQ publication Suspected Malpractice: Policies and Procedures and provide such information and advice as the awarding body may reasonably require.

This policy requirement was added within General Regulations for Approved Centres in response to the recommendations within the report of the Independent Commission on Examination Malpractice.

This section of the policy sets out the whistleblowing procedures for all Trust examination centres.

The head of each centre will be fully aware of the contents of this policy and will escalate any instances of malpractice to the relevant awarding body/bodies.

This section of the policy also sets out the principles which allow members of staff and students to feel confident in reporting instances of actual, alleged or suspected malpractice.

This section of the policy:

- encourages individuals to raise concerns, which will be fully investigated by appropriately trained and experienced individuals
- identifies how to report concerns
- explains how such concerns will be investigated and sets expectations regarding the reporting of outcomes
- provides details of relevant bodies to whom concerns about wrongdoing can be reported, including awarding organisations and regulators
- includes a commitment to do everything reasonable to protect the reporter's identity, if requested
- sets out how those raising concerns will be supported.

This section of the policy also details the steps that could be taken by an individual involved in the management, administration and/or conducting of examinations in any examinations centre fails to comply with its obligation to report any alleged, suspected or actual incidents of malpractice or maladministration.

The whistleblower

A whistleblower is defined as a person who reports an actual or potential wrongdoing and is protected by the Public Interest Disclosure Act 1998, providing they are acting in the public interest.

If the person raising the issue is a worker, this will be considered as whistleblowing. This includes agency staff and contractors.

Reporting

If a member of centre staff involved in the management, administration and/or conducting of examinations (such as exams officer, exams assistant or invigilator), a student or a member of the public (such as a parent/carer) has a concern or reason to believe that malpractice has or will occur in an examination or assessment, concerns should normally be raised initially with the Head of Governance.

Examples of malpractice

This section of the policy, includes reference to exams-related breaches including, but not limited to, the following:

- Failure to comply with exam regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies
- A security breach of the examination paper
- Conduct of centre staff which undermines the integrity of the examination
- Unfair treatment of candidates by either giving an advantage to a candidate/group of candidates (e.g. by permitting a candidate an access arrangement which is not supported by appropriate evidence), or disadvantaging candidates by not providing access to the appropriate conditions (providing a 'level playing field')
- Possible fraud and corruption (e.g. accessing the exam paper prior to the exam to aid teaching and learning)
- Abuse of authority (e.g. the head of centre/members of the senior leadership team overriding JCQ and awarding body regulations)
- Other conduct which may be interpreted as malpractice/maladministration

Whistleblowing procedure

If the individual does not feel safe raising the issue/reporting malpractice within the centre, or they have done so and are concerned that no action has been taken, that individual could consider making their disclosure to a malpractice expert at the awarding body for the qualification where malpractice is suspected.

For members of centre staff, it is likely that the Public Interest Disclosure Act (PIDA) will offer legal protection from being dismissed or penalised for raising certain serious concerns ('blowing the whistle').

Whistleblowing rights under PIDA are day one rights.

This means that the worker does not need the qualifying service that is needed for some other employment rights. In order to investigate concerns effectively, the awarding body should be provided with as much information as possible/is relevant, which may include:

- The qualifications and subjects involved
- The centre involved
- The names of staff/candidates involved
- The regulations breached/specific nature of suspected malpractice
- When and where the suspected malpractice occurred
- Whether multiple examination series are affected
- If the issue has been reported to the centre and what the outcome was
- How the issue became apparent

Members of the public are not protected by PIDA, but the awarding body will make every effort to protect their identity if that is what they wish, unless the awarding body is legally obliged to release it.

Alternatively, a worker could consider making a disclosure to Ofqual as a prescribed body for whistleblowing to raise a concern about wrongdoing, risk or malpractice.

Anonymity

In some circumstances, the whistleblower might find it difficult to raise concerns with the nominated member of the Trust. If a concern is raised anonymously, the issue may not be able to be taken further if insufficient information has been provided.

Alternatively, whistleblowers or others with concerns about potential malpractice can report the matter directly to Ofqual, who is identified as a 'prescribed body.

Awarding organisations are not prescribed bodies under whistleblowing legislation; however, awarding organisation investigation teams do give those reporting concerns the opportunity for anonymity.

A whistleblower can give their name, but may also request confidentiality; the person receiving the information should make every effort to protect the identity of the whistleblower.

Students

Students at each examination centre are made to feel comfortable discussing/reporting malpractice issues of which they are aware. The regulations surrounding their assessments, and wider academic integrity, will be reiterated to students who are undertaking, or who are about to undertake, their courses of study.

Monitoring and review

The Head of Governance will be responsible for monitoring the implementation and effectiveness of this policy. The policy will be reviewed by the Trust Board annually.

Appendix A:

The following are examples which may justify a Public Interest Disclosure:

- 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;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- public examination fraud;
- the deliberate concealment of any of the above matters.