St Gabriel the Archangel
Catholic Multi-Academy Trust

WHISTLEBLOWING

Document Control

Document Information	Detail
Policy Title	Whistleblowing
Policy Type	Statutory
Policy Audience	Public / Staff
Policy Owner	Chief Operating People Officer
Executive Lead	Chief Operating People Officer
Approved By	Board of Directors / Committee
Date Approved	17 September 2026
Date Effective	September 2026
Review Frequency	Annual or earlier due to any legislative changes
Next Review Date	September 2027
Version	2
Applies To	All Schools within St Gabriel the Archangel Catholic Multi Academy Trust
Related Legislation	Public Interest Disclosure Act 1998 (PIDA), Employment Rights Act 1996, Data Protection Act 2018 & UK GDPR
Related Statutory Guidance	Department for Education (DfE) Whistleblowing Guidance for Schools, Government Guidance on Whistleblowing, Keeping Children Safe in Education (KCSIE)
Related Trust Policies	Grievance Resolution Policy, Disciplinary Policy, Complaints Policy, Child Protection & Safeguarding Policy, Staff Code of Conduct

Policy at a Glance

Who does this apply to?

This policy applies to:

- ☑ All schools within St Gabriel the Archangel Catholic Multi Academy Trust.
- ☑ Directors
- ☑ Regional Governors
- ☑ Local Governing Bodies.
- ☑ Executive Leaders.
- ☑ Senior Partners and Partners
- ☑ Trust staff
- ☑ School Leaders.
- ☑ Employees.
- ☑ Volunteers.
- ☑ Contractors (where appropriate).
- ☑ Pupils and families (where appropriate).

Key Responsibilities

Role	Responsibility
Board of Directors	Approves policy revisions, appoints the Designated Whistleblowing Trustee, oversees overall compliance, and acts as the point of contact for concerns involving the CEO or Board Chair.
CEO	Receives escalated disclosures from the CSEL or senior central team members and acts as the primary contact officer for whistleblowing reports.
Executive Leaders	**CSEL:** Receives disclosures regarding Principals or senior central team members. **COPO:** Serves as the Policy Owner and Executive Lead responsible for policy oversight and implementation.
Headteachers	Receive initial whistleblowing disclosures from school staff and escalate concerns to the Principal/CSEL/CEO as appropriate.
Governors	Oversee local policy awareness and receive escalated concerns involving the Principal via the Chair of the Governing Body.
Employees	Report genuine concerns regarding dangerous, unlawful, or unethical practices promptly using internal channels and maintain strict confidentiality.

Our Mission

Forming Christ-centred pilgrims of hope with kind hearts, questioning minds, a thirst for knowledge and a hunger for justice.

St Gabriel the Archangel Catholic Multi Academy Trust exists to provide an exceptional Catholic education in which every child, every colleague and every community flourishes.

Whilst this policy fulfils statutory and regulatory requirements, it is also an expression of our Catholic mission and our commitment to the dignity of every person, inspired by the Gospel and the teachings of Jesus Christ.

Every policy within our Trust should therefore be understood not simply as a compliance document, but as a practical expression of our mission, values and service to others.

Our GABRIEL Ambitions

This policy contributes to our seven strategic ambitions.



Generous

We cultivate generous, joy-filled communities of belonging where every person is seen, cherished and empowered to flourish. Inspired by Christ, we place the most vulnerable first, working in partnership with families, parishes and local communities to transform lives.



Ambitious

We relentlessly pursue ambitious achievement for every pupil, removing barriers and widening horizons through exceptional teaching, transformative formation and inspiring experiences.



Brave Pastoral Care

We lead with courageous love, compassion and justice, ensuring every child and family is safe, known, valued and able to flourish.



Resilient Stewardship

We steward our people, resources and environment wisely and sustainably, ensuring our mission grows stronger for future generations.



Influential

We cultivate deep integrity, expertise and vocation, empowering leaders at every level to shape the future of Catholic education through collaboration and service.



Empowered Oracy

We develop confident, articulate individuals who communicate with clarity, compassion and courage, enabling them to influence the world for good.



Life-Giving Chaplaincy

We place Christ unmistakably at the heart of all we do, nurturing encounter, belonging and purpose through vibrant chaplaincy and Gospel witness.

Our Characteristics

Every member of our Trust seeks to live these characteristics in the implementation of this policy.

We:

- **Stand in God's Presence with Confidence and Humility**
- **Speak with Peace and Courage**
- **Believe that, with God, Nothing is Impossible**
- **Listen with Love**
- **Serve a Mission Greater Than Ourselves**

These characteristics shape not only what we do, but how we do it.

Our Operating Principles

These principles guide decision-making throughout our Trust and underpin the implementation of every policy.

Focus on What Matters Most
(The 80/20 Principle)

We prioritise the work that makes the greatest difference for children and young people, ensuring our time, expertise and resources are directed where they have the greatest impact.

Everyone is Seen and Supported
(No-One Unseen)

Every child, colleague, family and community matters. We actively seek to ensure that no-one is overlooked and everyone is known, valued and supported to flourish.

Collaborate and Co-Create
(Remember the 'Co')

We believe that our greatest strengths emerge through partnership. We listen carefully, value professional expertise and co-design solutions that improve outcomes across our Trust.

Innovate with Purpose
(Evidence-Informed Practice)

We embrace thoughtful innovation rooted in research, evidence and continual learning. We seek improvement that is purposeful, sustainable and centred on better outcomes for children.

Compliant Now, Beyond Compliant Next

We fulfil every statutory and regulatory requirement with integrity whilst continually striving to move beyond compliance towards excellence, innovation and transformational impact.

How This Policy Supports Our Ambitions

Our Commitment	How this policy contributes - very brief
Christ-centred	Protects truth, justice, and human dignity by encouraging staff to speak out against malpractice in line with Gospel values.

Generous Communities	Fosters a safe, transparent culture of trust where employees are supported when raising concerns without fear of reprisal.
Ambitious Achievement	Ensures high standards of conduct and ethical integrity, maintaining a safe and focused environment for pupil success.
Brave Pastoral Care	Provides robust protection for whistleblowers, ensuring individuals are safeguarded against victimisation, detriment, or harassment.
Resilient Stewardship	Safeguards public funds, Trust assets, and governance through early detection and remedy of fraud, illegal acts, or negligence.
Influential Partnerships	Works alongside external bodies, trade unions, and prescribed organisations (such as Protect or the NSPCC) to ensure transparent reporting.
Empowered Oracy	Empowers staff to speak with peace and courage by providing clear, accessible, and structured channels to report wrongdoings.
Life-Giving Chaplaincy	Upholds ethical accountability, moral integrity, and systemic fairness across all Trust operations.

Purpose

This policy sets out the Trust's framework for encouraging and enabling employees to report suspected dangers, unlawful acts, or serious workplace malpractice in the public interest. It ensures that all disclosures are investigated thoroughly and confidentially while protecting whistleblowers from victimisation, detriment, or dismissal.

Scope

This policy applies to:

- All schools within St Gabriel the Archangel Catholic Multi-Academy Trust.
- Directors
- Regional Governors
- Local Governing Bodies.
- Executive Leaders.
- Senior Partners and Partners
- Trust staff
- School Leaders.

- Employees.
- Volunteers.
- Contractors (where appropriate).
- Pupils and families (where appropriate).

Definitions

Whistleblowing: The raising of a concern, either internally or externally, regarding a danger, risk, malpractice, or wrongdoing that affects others, legally defined as making a "protected disclosure".

Protected Disclosure: A disclosure of information made in the public interest that, in the reasonable belief of the worker, shows serious misconduct or wrongdoing specified under the Public Interest Disclosure Act 1998 (PIDA).

Public Interest: A disclosure that affects the wider public, school community, or Trust, rather than an individual's personal employment contract or personal circumstance.

Wrongdoing / Malpractice: Actions including criminal offenses, breaches of legal obligations, miscarriages of justice, health and safety dangers, environmental damage, financial fraud, or the deliberate concealment of any of these matters.

Worker: An individual covered under the policy, including full-time, part-time, temporary, and volunteer staff, agency workers, contractors, suppliers, and service users.

Prescribed Person / Body: An external organisation recognised by law (such as the NSPCC, Ofsted, or Protect) to which a worker may make a protected disclosure if internal reporting is unsuitable.

Principles

In implementing this policy we will:

- uphold the teachings and values of the Catholic Church and the protocols of the Archdiocese of Birmingham;
- place children and young people at the centre of decision-making;
- promote dignity, inclusion and equity;
- comply with all statutory requirements;
- use evidence-informed practice;
- promote collaboration and shared responsibility;
- maintain high professional standards;
- continually evaluate and improve our practice.

Roles and Responsibilities

Board of Directors

Approves policy revisions, appoints the Designated Whistleblowing Trustee, oversees overall compliance, and acts as the escalation point for disclosures involving the CEO or Board Chair.

CEO

Acts as the primary contact officer for whistleblowing disclosures, receives escalated reports from the CSEL or central team, and oversees investigations into executive-level matters.

Executive Leaders (CSEL, COIO, CFO, COPO)

Receives disclosures relating to Principals or senior central team members. **COPO:** Policy owner responsible for policy implementation, maintenance, and operational oversight.

Regional Governors

Receive escalated concerns involving local governance or Regional Governors, supporting independent review where appropriate.

Local Governing Bodies

Ensure local awareness of the policy and receive escalated concerns involving the Principal via the Chair of the Governing Body.

Principals

Receive initial whistleblowing reports from line managers or direct disclosures from academy staff and escalate to the CSEL/CEO as required.

Employees

Report genuine concerns regarding unlawful, dangerous, or unethical practices promptly using internal channels and maintain strict confidentiality.

Pupils and Families (where applicable)

Can raise public interest concerns or service complaints, which will be routed through the appropriate Whistleblowing or Safeguarding frameworks.

Policy

Introduction

'Whistleblowing' is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice, or wrongdoing which affects others. It is referred to in law as "making a protected disclosure." It has a specific legal definition under the Public Interest Disclosure Act 1998 ("PIDA"), i.e., "a disclosure of information which, in the reasonable belief of the worker, is made in the public interest and tends to show serious misconduct." The policy is based on the **Public Interest Disclosure Act 1998 (PIDA)** and is aligned with government guidance on whistleblowing. This addresses the recommendation to reference government guidance.

This malpractice may constitute any behaviour detrimental to the best interests of the St Gabriel the Archangel Catholic Multi-Academy Trust (SGtA CMAT), its stakeholders, and its employees. Specific examples of issues covered by the Whistleblowing Policy include:

- Any unlawful act
- Health and safety issues
- Damage to the environment
- Unauthorised use of public funds
- Fraud, corruption, and wrongdoing of any description
- Inappropriate or improper conduct (including bullying, bribery, or harassment)
- Serious failure to comply with appropriate professional standards
- Breach of the SGtA CMAT's Articles of Association or other policy or Code of practice
- Discrimination of any kind
- Negligence
- Any form of unethical conduct
- The deliberate concealment of any of the above matters

The SGtA CMAT's Whistleblowing Policy does not apply to raising grievances about an employee's personal situation. Any such concerns should be raised under the existing provisions for raising grievances.

Provided that you have a **reasonable belief** that the disclosure is made **in the public interest**, and that the alleged malpractice has occurred, is occurring, or is likely to occur, you can disclose your concerns using this procedure and be protected by law from victimisation or dismissal.

Aims of the Policy

The aims of this Policy are to provide an internal mechanism for reporting, investigating, and remedying any wrongdoings within our SGtA CMAT. With this in mind, the Board of Directors is hopeful that workers and/or members of the public will raise matters internally rather than alerting external bodies or contacts. However, if a worker has good reason to believe that a) their disclosure will not be managed properly by St Gabriel the Archangel Catholic Multi-Academy Trust or b) that they will be exposed to victimisation or any other detriment as a result of making the disclosure internally, they may contact external bodies directly. Contact details are at the end of this document.

- Encourage employees to feel confident about raising concerns and to question and act on those concerns.
- Provide ways for employees to raise concerns and receive feedback on any action taken as a result.
- Reassure employees that if they raise concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation.
- Ensure that employees are aware of the options available to them if they are dissatisfied with the SGtA CMAT's initial response.

Who is covered by the Policy?

The SGtA CMAT's Whistleblowing Policy applies equally to all of the following groups:

- All employees (including part-time, temporary, and volunteer staff)
- Agency staff working for the SGtA CMAT
- Contractors and suppliers
- Organisations working with the SGtA CMAT under partnership arrangements
- Service users and stakeholders

What assurance does the Whistleblowing Policy provide?

Individuals raising concerns under the Whistleblowing Policy will not be at risk of any form of retribution or sanction, including losing their job or contract with the SGtA CMAT, provided that:

1. The disclosure is made in good faith
2. There is a genuine and reasonable belief that the information, and any allegations contained in it, is substantially true
3. The disclosure is not motivated by personal gain

The SGtA CMAT will not tolerate harassment or victimisation of anyone raising a genuine concern. However, where matters which are known to be untrue are raised maliciously, it is likely that disciplinary action will be taken against the person.

Distinguishing Whistleblowing from Other Concerns

Not all concerns raised by staff will fall under the scope of whistleblowing. A whistleblowing concern relates to suspected wrongdoing or dangers at work that are in the public interest, such as:

- Criminal offences;
- Failure to comply with a legal obligation;
- Miscarriage of justice;
- Endangerment of the health and safety of an individual;
- Damage to the environment;
- Deliberate concealment of wrongdoing.

Concerns that relate to personal circumstances, such as dissatisfaction with an individual's own employment position, are usually dealt with under the **Grievance Policy**. Complaints about services or decisions may be dealt with under the **Complaints Policy**, and concerns relating to the safety or welfare of children or vulnerable people should be raised under the **Child Protection/Safeguarding Policies**.

For further guidance on the distinction between whistleblowing and grievances, staff are encouraged to consult Protect (formerly Public Concern at Work): https://protect-advice.org.uk/what-is-whistleblowing/

Making a Disclosure/Raising a Concern

The SGtA CMAT has established the following primary mechanisms for employees to report their concerns:

1. Initial Reporting:

If an employee reasonably believes they have discovered serious malpractice within the workplace, they should raise these concerns with their line manager, who will then escalate the matter to the Principal/CSEL/CEO.

Concerns may be raised verbally or in writing, although staff are encouraged to make reports in writing wherever possible. Written reports should include:

- The names of those alleged to be involved in the wrongdoing;
- Dates, times and places relevant to the concern;
- Any available evidence or supporting context;
- Whether the individual has any personal interest in the matter.

Concerns should be raised as soon as possible to allow timely investigation.

2. Escalation Process:

- If reporting to the line manager is not possible or appropriate, the employee should contact the Principal directly.
- If the Principal is suspected of involvement, the concern should be raised with the Catholic Senior Executive Leader (CSEL) or the Chair of the Governing Body.
- If the CSEL or a senior member of the central team is suspected, the concern should be raised with the CEO
- In cases where the CEO or Chair of the Governing Body or Regional Governors may be involved, the employee should contact the Chair of the Board of Directors.
- Should there be a suspicion of involvement by the Board of Directors, the Director of Schools at the Birmingham Diocesan Education Service should be contacted.

Designated Whistleblowing Trustee

To ensure independence and accessibility, the Board of Directors has appointed a designated Whistleblowing Director. Staff may contact this individual directly if they feel that their concern cannot be raised through standard management channels or if they prefer to report to a member of the Board who is independent of the executive management team.

- **Name of Designated Trustee:** Julia Bridgewater - Chair of Board of Directors
- **Role:** Independent Whistleblowing Director
- **Direct Confidential Email:** governance@sgacmat.co.uk Private & Confidential
- **Postal Address:** Marked *'Private & Confidential — To be opened by Addressee Only'*, C/O Governance Team, St Gabriel the Archangel Catholic Multi-Academy Trust, Station Road, Cheadle, ST10 1LH

3. **Investigation Process**:
    - Upon receiving a concern, the appropriate investigating officer will be assigned based on the nature of the concern and the individuals involved.
    - The investigating officer will arrange a meeting with the whistleblower to discuss the concern in detail.
    - All concerns can be raised verbally or in writing.
4. **Anonymous Reporting**:
    - While anonymous allegations will be considered, it is much more challenging to investigate them fully. The Whistleblowing Policy is designed to protect staff raising genuinely held concerns, and individuals utilising the provisions of the policy are encouraged to identify themselves. Feedback relating to any investigation can only be provided where contact details are known.

Confidentiality

All concerns will be treated in confidence, and every effort will be made not to reveal an employee's identity if they so wish. At the appropriate time, however, the employee may need to come forward as a witness. Employees reporting concerns also have a duty to observe this confidentiality.

How will the SGtA CMAT respond?

The SGtA CMAT's response will depend on the nature of the concern that has been raised. In all instances, the SGtA CMAT will:

- Record and acknowledge the issue raised and refer it for investigation within three days of receiving the information or sooner, depending on the nature of the concern and its potential impact.
- Respect confidentiality. The SGtA CMAT will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated, however, that this is not always possible. The investigation process may reveal the source of the information, and a statement by you may be required as part of the evidence. The person investigating the matter will be informed of any confidentiality requirements relating to the disclosure.
- Decide on appropriate action e.g. Audit Services investigation, other internal investigation, referral to the police, or other external organisation.
- Subject to any legal constraints, the relevant employee will normally be informed of the final outcome of any investigation undertaken.

At the conclusion of an investigation (whether initial or further), a written report will be prepared setting out:

- Findings of fact;
- Whether wrongdoing has occurred;
- Recommendations for corrective action;
- Whether referral to an external organisation (such as the police or local authority) is required.

The Trust will also review relevant policies, procedures and practices in light of the concern, documenting any lessons learned and identifying changes required to reduce the risk of recurrence.

How can a concern be taken further?

If employees remain dissatisfied with the SGtA CMAT's response, they may contact the following organisations for advice:

1. **Protect (formerly Public Concern at Work)**:
    - Address: Suite 301, 16 Baldwin Gardens, London EC1N 7RJ
    - Tel: 020 3117 2520
    - Email: whistle@protect-advice.org.uk
2. **NSPCC Whistleblowing Advice Line**:
    - Tel: 0800 028 0285
    - Email: help@nspcc.org.uk
3. **Confidential Public Interest Disclosure Line**:
    - Tel: 0845 052 2646

In addition, individuals have the option of taking advice from their trade union, the Citizens Advice Bureau, their own legal representation, etc.

Contact Office:

Accounting Officer/CEO
Miss Toni Ellis
St Gabriel the Archangel Catholic Multi-Academy Trust
C/O Painsley Catholic College,Station Road, Cheadle, ST10 1LH

Tel: 01902 558569
Email: enquires@sgacmat.co.uk