Whistle Blowing Policy
KTS Academy

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Approved by:	Sarah Gunn	**Date:** September 2025
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1. Introduction

1.1 KTS Academy is committed to achieving high standards of integrity and accountability. This policy provides a framework for employees and contractors, to raise concerns which they believe are in the public interest and may relate to illegal, improper or unethical conduct. The whistleblowing policy forms part of the Academy's overall counter fraud framework. There are different mechanisms for members of the public or others with concerns to report them to the Academy, for example through the counter fraud hotline or complaints procedures. Whilst many of the principles covered in the whistleblowing policy relate to any report of wrongdoing at the Academy, this policy is designed solely for the use of employees and contractors.

1.2 The Academy tries to create an open environment in which employees and those working on behalf of the Academy are encouraged to raise issues with the confidence that they will be acted upon appropriately. Our message to employees is straightforward - if in doubt, raise it!

1.3 The Public Interest Disclosure Act 1998 (PIDA) protects employees against detrimental treatment or dismissal as a result of any disclosure of information in the interests of the public. This policy is designed to conform to legislation as well as guidance from the government and relevant bodies.

1.4 This policy should be used where there are concerns about consequences for other employees or the public and does not apply to matters relating exclusively to one's own employment.

1.5 A guide for managers or other employees on how to proceed if they receive a whistleblowing report is contained in Appendix A of this policy.

2. Aims and scope of the policy

2.1 The policy aims to:

- encourage employees to raise any serious concerns they have about their workplace or working practices:
- ensure that employees get a response to their concerns and that they are aware of how to pursue them if they are not satisfied with any action or inaction; and
- assure employees that if they raise any concerns in the public interest then action will be taken to protect them from possible reprisals or victimisation.

2.2 This policy applies to any person working for the Academy. This includes both permanent and temporary staff and also covers agency personnel and staff seconded to or from a third party. Contractors working for the Academy may also use the provisions of this policy to make the Academy aware of any relevant concerns.

2.3 Protection under PIDA is not provided to job applicants, self-employed workers or volunteers, however concerns can still be reported through whistleblowing channels.

2.4 Set out below is a list of circumstances that should be reported through this policy and qualify for protection under legislation:

- a criminal offence has been committed, is being committed, or may be committed, e.g. corruption, theft, or fraud;

- a person has failed, is failing, or may fail to comply with any legal obligation to which they are subject, e.g. breach of any statutory Code of Practice;

- a miscarriage of justice has occurred, is occurring, or may occur;

- the health or safety of any individual has been, is being, or may be endangered, e.g. abuse of any vulnerable adult or child;

- the environment has been, is being, or may be damaged; or

- information tending to show any matter falling within any of the above categories has been, is being, or may be deliberately concealed, e.g.

- failure to take reasonable steps to report or resolve any situation which is likely to cause significant financial loss to the Academy.

2.5 This whistleblowing policy is intended for people to raise concerns that are in the public interest and where the interests of others or of the organisation itself are at risk. It is intended to supplement, rather than to replace, other employment procedures whereby employees of the Academy may already raise complaints or matters of genuine concern relating to their own employment.

3. Safeguards

3.1 The Academy recognises that the decision to report a concern can be a difficult one to make. In many cases it is employees who are most likely to be in the best position to learn of any malpractice or wrongdoing within the Academy or school setting and to identify something which falls below the standards which the Academy and the public are entitled to expect. The Academy is grateful to all employees who report their concerns.

3.2 Employees should have nothing to fear by reporting their concerns, if what they are reporting is true (or they honestly believe the information is true even if it is later found out to be incorrect). No action will be taken against anyone genuinely reporting a concern.

3.3 Deliberately providing false or misleading information however is a serious matter which may result in action being taken under the Academy disciplinary policy. Equally, deterring another employee from reporting their concerns is a serious matter and also may result in disciplinary action.

3.4 The Academy will not tolerate the harassment or victimisation of anyone who has raised a concern. However, it is recognised that an individual may nonetheless want to raise a concern in confidence under this policy. If a member of staff asks the Academy to protect their anonymity, efforts will be taken to protect their identity from being disclosed. If a situation arises where a concern cannot be resolved without revealing their identity (for instance, because evidence is needed in court or will be revealed as part of a subsequent investigation) this will be fully discussed with the employee in question.

3.5 The policy encourages employees to put their names to allegations. Concerns expressed anonymously will still be considered by the Academy, however complaints of this type can be harder to substantiate and therefore have to be treated with a degree of caution. It will also not be possible to provide feedback to the member of staff reporting the concern during or following any investigation. Anonymous reports are preferred to silence, however.

4. How to raise a concern

4.1 Whistle-blowers should normally raise concerns with their immediate line manager. However, if it is believed that their line manager is involved in the malpractice being reported or has failed to take appropriate action when the matter has been raised previously, then their concern should be raised with the Chair of Governors. Contractors should report concerns to their contract manager.

4.2 It is, however, appreciated that there may be times when whistle-blowers, including contractors, feel unable to use the above procedure; the issue may involve line managers and senior members of staff, or the issue was already raised through the normal channels but had not been addressed or resolved. In these cases, they can contact the Academy's independent whistleblowing hotline on XXXX.

4.3 If anonymous concerns are raised through social media then they will be considered under the more general counter fraud framework or complaints policy unless it is beyond doubt that the person raising the concern is an employee or contractor of the Academy.

5. How the school will respond

5.1 All whistleblowing reports will be carefully considered and initial enquiries will be made to help decide whether an investigation is appropriate, and if so what form it should take.

5.2 The Academy will aim to acknowledge all whistleblowing reports within five working days. The officer(s) assigned to carry out the whistleblowing investigation will endeavour to write or speak to the whistle-blower promptly to provide additional information on how the investigation will progress.

5.3 Officers assigned to investigate a whistleblowing report will be determined by the nature of the report, e.g. safety issues could be investigated by the Health & Safety Team, alleged fraud or criminality by the Counter Fraud Team, employment issues by a manager from another service with support from Human Resources.

5.4 The amount of contact between the officers considering the issues and the whistle-blower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information may be sought from the whistle-blower.

5.5 If a face-to-face meeting is necessary or desirable the whistle-blower has the right, if they so wish, to be accompanied by a Union representative or a colleague who is not involved in the area of work to which the concern relates.

5.6 The Academy will, as far as it is able, take steps to minimise any difficulties that the whistle-blower may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Academy will, where appropriate and as far as it is able to do so, provide advice about the process.

5.7 The Academy accepts the whistle-blower needs to be assured that the matter has been addressed. Thus, subject to any legal constraints, e.g. data protection, information about the outcomes of any investigations will be provided.

6. How matters can be taken further

6.1 This policy is intended to provide staff with an appropriate avenue to raise concerns within the Academy. If employees have reported concerns in accordance with the Academy whistleblowing policy but are not satisfied that the issues have been properly addressed, then they may contact:

- the Academy External Auditor
- the NSPCC or Ofsted (for concerns about children at risk of abuse)[1];
- relevant professional bodies or regulatory organisations[2], for example, the Information Commissioner's Office, Care and Quality Commission (CQC), and the Health and Safety Executive.

6.2 Disclosure of a concern to a non-prescribed body (e.g. newspapers or social media) is not covered by whistleblowing legislation and the protections it offers. Before undertaking this type of action, it is recommended that staff seek specialist advice.

7. Independent advice

7.1 Free confidential advice on how to raise a concern about malpractice at work can be sought from the independent charity PROTECT at www.protect-advice.org.uk, or via email info@protect-advice.org.uk. Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work.

8. General data protection

8.1 When managing whistleblowing reports, the Academy processes personal data collected in accordance with its Information Governance policies. Data collected from the point at which a report is made is held securely and accessed by, and disclosed to, individuals only for the purposes of managing and investigating the concern raised.

9. Review of the policy

9.1 The Policy will be reviewed at least every three years or when significant changes to whistleblowing legislation, the organisation or case law occurs.

[1] NSPCC and Ofsted offer dedicated national whistleblowing hotlines (see www.nspcc.org.uk and www.gov.uk/government/organisations/ofsted for further details).

[2] The Department for Business, Innovations and Skills maintains a list of prescribed persons and organisations who may be contacted, www.gov.uk/government/publications/blowing-the-whistlelist-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies.