Compass Eko

Trust

Whistleblowing

Monitoring, evaluation and review

The board of Trustees will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout all Trust schools.

This Policy will be reviewed by the Board of Trustees on a 3 yearly cycle.

Adherence to the policy will be monitored by the Local School's Committee.

Policy adopted:	Summer Term 2026
Aligned for	All schools
Other related policies:	• Grievance Procedure • Complaints Procedure • Code of Conduct • KCSIE– managing allegations against staff • Safeguarding and child protection • Modern slavery Statement • Online Safety
Next Review:	Summer Term 2029

Contents

Monitoring, evaluation and review.....2
About this policy 3
Aims.....4
Responsibilities.....4
What is whistle blowing.....4
Whistleblowing and safeguarding.....5
Raising a whistleblowing concern.....6
Confidentiality.....7
Investigation and outcome.....8
If you are not satisfied.....8
External disclosures.....9
Protection and support for Whistleblowers.....9
Contacts.....10
Appendix.....11

About this policy

We are committed to running our schools with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations from occurring and to address them when they do occur. Our organisation is committed to conducting business ethically and responsibly. We have zero tolerance for modern slavery, human trafficking, forced labour, or exploitation in any form within our operations or supply chains.

This policy reflects changes introduced by the Employment Rights Act 2025, which from 6 April 2026 expressly include disclosures about sexual harassment as protected

whistleblowing disclosures. The Trust is committed to creating an environment where staff feel able to speak up without fear of reprisal and supports these legislative updates, which aim to address the known under-reporting of workplace sexual harassment.

Aims

- To encourage staff to report suspected wrongdoing or low-level concerns as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken, though vexatious of malicious concerns may be considered a disciplinary issue.
- This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.
- This policy has been written in line with the Academy trust handbook - Guidance - GOV.UK and well as Whistleblowing: guidance and code of practice for employers - GOV.UK We also take account of the Public Interest Disclosure Act 1998.
- This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibilities

- The Board of Trustees has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- The Whistleblowing Officer, in conjunction with the Audit and Risk Committee should review this policy from a legal and operational perspective at least once every 2 years.
- All staff members are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include, but is not limited to:

- 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
- concerns relating to sexual harassment, whether past, ongoing, or likely to occur
- the deliberate concealment of any of the above matters.

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

This policy should not be used for complaints about an employee's personal circumstances, such as general concerns about the way they have been treated at work. These should normally be raised under the school's Grievance Procedure (available on the Compass Eko Portal). However, concerns relating to sexual harassment that an employee reasonably believes amount to a matter of public interest may constitute a protected disclosure under whistleblowing legislation and may be raised under this policy. If the matter relates to salary, it should be raised under the salary review procedures documented in the school's pay policy.

It will usually be more appropriate to raise a concern about child safety under our Safeguarding including Child Protection Policy. A concern about a pupil being treated unfairly by the school should be raised initially with the Head Teacher or Child Protection Officer of that school. Pupil complaints will be dealt with separately under our Complaints Procedure.

If you are unsure about whether something is within the scope of this policy you should seek advice from the Head Teacher of the school to which your concern relates or, to the Whistleblowing Officer, whose contact details are at the end of this policy.

Protect (formerly Public Concern at Work) Whistleblowing Code of Practice - Protect - Speak up stop harm has further guidance on the difference between a whistle blowing concern and a grievance that staff may find useful if unsure.

Whistle blowing and Safeguarding

Staff members have a contractual duty to raise concerns if they have information which indicates that a member of staff/supply teacher/volunteer may have;

- behaved in a way that has, or may have, harmed a child;
- possibly committed a criminal offence against or in relation to a child;
- behaved towards a child or children in a way which indicates they would pose a risk of harm if they work regularly or closely with children;
- behaved in a way contrary to the Staff Code of Conduct;
- behaved in a way that may meet the threshold of a low-level concern, including behaviour that is inconsistent with the staff code of conduct and may not meet the harm threshold but still requires recording and review.

This applies to any child the member of staff / supply teacher / volunteer has contact with in their personal, professional or community life.

Any allegation should be reported immediately and will be dealt with in accordance with the Trust's Safeguarding including Child Protection Policy and the Keeping Children Safe in Education statutory guidance as outlined above.

All concerns, including low-level concerns, must be recorded, shared with the Headteacher (or appropriate senior leader) and managed in line with Part 4 of KCSIE to ensure patterns of behaviour are identified and responded to appropriately.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with the Head Teacher of the school concerned. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. Whistleblowing may be undertaken on any staff. Supply staff, volunteers, trainees, casual staff or contractors.

In some cases, you may refer the matter to the Whistleblowing Officer. However, where the matter is more serious, or you feel that the Head Teacher has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

The Whistleblowing Officer, Kate Jarrett-Shorter

The Whistleblowing Trustee, Susan Skidmore

The Chief Executive Officers, John Camp / Rebekah Iiyambo

The Trust Safeguarding Lead, Holly Gibson

We also have a dedicated confidential email address for whistleblowing disclosures. Emails sent to this account will be received by the Whistleblowing Officer and the Chair of Trustees. Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

If the concern raised suggests a direct safeguarding concern the headteacher will assess whether it is necessary to refer the matter to the Local Authority Designated Officer (LADO) for Education. Prior to undertaking any further investigations into the actual allegation. If the allegation meets the criteria for LADO involvement a strategy meeting may take place to ascertain who is best fit to undertake further investigations.

In line with KCSIE, where a concern does not meet the harm threshold, it must still be recorded and managed as a low-level concern. The Headteacher (or appropriate senior leader) should ensure such concerns are reviewed, stored securely, and used to inform safeguarding culture and staff conduct expectations.

Where the Whistleblowing concern raises an allegation against a member of Staff, the Headteacher will follow Guidance from *KCSIE – Allegations against staff* and maintain a record of these in accordance with the same guidance. Headteachers can use this form Example reporting log for allegations against staff and store this along with all other information on the headteacher secure area of SharePoint for their individual school or use the secure Staff allegations Portal in My Concern / CPOMs.

Where allegations are made about headteachers the same process and form will be followed and saved in Exec secure area.

Where a member of staff feels unable to raise an issue with those named above other channels available to them include the LADO or NSPCC.

Confidentiality

We hope that staff members will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

The Governing Body recognises that disclosures relating to sexual harassment may require heightened sensitivity. Confidentiality will be prioritised wherever reasonably practicable.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or the CEO and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the

independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

In line with KCSIE, safeguarding and whistleblowing records must:

be kept in a secure and confidential manner;

be accessible only to those with a legitimate safeguarding role;

form part of the wider safeguarding recording and information-sharing systems where appropriate.

All notes and required records resulting from the Whistleblowing concerns raised will be shared electronically, securely and confidentially on the secure / access limited areas detailed above.

Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff or trustees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

We will normally aim to conclude our initial investigation within approximately 28 days. However, the timescale may vary depending on the complexity of the matters raised, the availability of witnesses and whether expert legal or other professional advice is required.

In the unlikely event that we conclude a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action. However, a whistleblower who raises a concern genuinely but mistakenly will be supported.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts above. Alternatively, you may contact the Chair of our

Audit and Risk Committee AND/OR the Chair of the Board of Trustees. Contact details are set out at the end of this policy.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace where this is in the public interest. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some limited circumstances it may be appropriate for you to report your 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 Governing Body's response, the manager should ensure that they are made aware with whom they may raise the matter externally

Whistleblowing to an external agency without first going through the internal procedure is a breach of the Trust's Code of Conduct and could result in disciplinary action. The manager should stress to the employee that if they choose to take a concern outside the school, 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.

The external agencies that may be used if disclosure is permitted are:

- Department for Education (DfE). (In these circumstances, the DfE/ESFA will assess whether all internal processes have been applied and that we have done everything possible to resolve the issue. If this is not the case, the DfE/ESFA will refer the matter back to us);
- Member of Parliament;
- National Audit Office;
- Health and Safety Executive;
- Police

A list of prescribed bodies to whom staff can raise concerns with is included Whistleblowing: list of prescribed people and bodies - GOV.UK

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your Head Teacher or one of the other individuals set out above for guidance.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff members who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Contacts

Whistleblowing Officer	Kate Jarrett-Shorter KJarrett@compasseko.uk
Whistleblowing Trustee	Susan Skidmore sskidmore@compassps.uk
Dedicated Whistleblowing Email Account	whistleblowing@compasseko.uk
Chief Executive Officers	John Camp OBE / Rebekah Iiyambo co-ceos@compasseko.uk
Chair of the Audit and Risk Committee	Yvette Stander ystander@compasseko.uk
Trust Safeguarding Lead	Holly Gibson hgibson@compasseko.uk
Chair of the Board of Trustees	Sue Hellman shellman@compasseko.uk

Appendix 1: For display in staffrooms

Whistleblowing

What is whistleblowing?

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing within their organisation.

Raising a concern is known as "blowing the whistle" and is a vital process for identifying risks to people's safety.

Sharing information or talking through a concern can be the first step to helping an organisation identify problems and improve their practices.

What the law says about whistleblowing

If you disclose information about wrongdoing the law protects you from being treated unfairly or losing your job. A disclosure qualifies for protection if you are a worker, and you disclose something about an organisation.

A disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

This is set out in the Public Interest Disclosure Act 1998.

When to Whistleblow

If you have raised concerns about a child, a member of staff, agency staff, contractor, Trainee or volunteer or organisational procedures and you do not feel they have been taken seriously.

You have concerns about the Head Teacher.

Who do I Whistleblow to?

Kate Jarrett-Shorter - Whistleblowing Officer: KJarrett@compasseko.uk
Susan Skidmore– Whistleblowing Trustee: sskidmore@compassps.uk
Holly Gibson – Trust Safeguarding Lead: hgibson@compasseko.uk
John Camp / Rebekah Iiyambo – CEO: co-ceos@compasseko.uk
NSPCC Whistleblowing Advice Line - 0800 0280285, email: help@nspcc.org.uk