Flying High Partnership

Whistleblowing Policy

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Contents

1. Introduction.....2
2. What is Whistleblowing?.....3
3. Raising a Whistleblowing Concern.....4
4. Confidentiality.....4
5. Anonymous Disclosures.....4
6. Concerns Raised About External Individuals or Organisations Engaged by FHP.....5
7. Concerns Raised by External Individuals.....5
8. Investigation and Outcome.....5
9. If you are Not Satisfied.....6
9. Protection and Support for Whistleblowers.....6
10. Training and Awareness.....6
11. Confidentiality Statement in Relation to Whistleblowing Disclosures.....7

1. Introduction

We are committed to conducting our service provision with honesty and integrity, and we expect you all to maintain high standards. 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 in order to prevent such situations occurring or to address them when they do

occur. The Trust Board will review and record the whistleblowing arrangements annually to ensure they remain effective and compliant.

The aims of this policy are:

a) To encourage you to report suspected wrongdoing 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.
b) To provide you with guidance as to how to raise those concerns.
c) To reassure you that you should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy is informed by the Department for Education's guidance on whistleblowing in schools and the statutory guidance Keeping Children Safe in Education (KCSIE). It aligns with the Public Interest Disclosure Act 1998 (PIDA), which amends the Employment Rights Act 1996 to enable workers to raise concerns in an appropriate manner and without fear of reprisal. Additionally, this policy takes into account the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

This policy and procedure applies to all Flying High staff unless otherwise indicated. It does not form part of the terms of your contract with us, which are provided to you separately.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-Harassment and Anti-Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy, you should seek advice from your trade union or the FHP HR Department (HR@flyinghightrust.co.uk).

2. What is Whistleblowing?

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

a) Criminal activity.
b) Miscarriages of justice.
c) Danger to health and safety.
d) Damage to the environment.
e) Failure to comply with any legal or professional obligation or regulatory requirements.
f) Financial fraud or mismanagement.
g) Negligence.
h) Breach of our internal policies and procedures.
i) Conduct likely to damage our reputation.
j) Unauthorised disclosure of confidential information.
k) The deliberate concealment of any of the above matters.
l) Something that makes you feel uncomfortable in terms of known standards.
m) Something not in keeping with the school's regulations and policies.
n) Something that falls below established standards of practice
o) Improper behaviour

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

3. Raising a Whistleblowing Concern

Under this policy, disclosures about possible malpractice should be raised with at least one of the following people:

- **Headteacher/FHP Senior Lead:** if the reporting employee works within an academy. Where an employee of an academy feels that reporting their concerns to the Headteacher or FHP Senior Lead would be inappropriate they should report to the Chair of the Local Governing Body.
- **CEO:** if the reporting employee is a Headteacher or is employed within the FHP Central Team for the partnership. Where reporting to the CEO is inappropriate, the reporting employee should contact the Chair to the Trust Board.
- **Finance Director:** if concerns raised are related to financial management. If this would be inappropriate contact should be made with the Chair to the Trust Board.
- **Chair of Trust Board:** Concerns may be reported to the Chair of Trust Board.

You may tell them in person or put the matter in writing if you prefer.

They 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.

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

If, at any time, you feel that concerns have not been addressed you can escalate your concerns to someone else within the reporting channels outlined above.

4. Confidentiality

We hope that you 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 do this. It is recognised that most cases of whistleblowing will have to proceed on a confidential basis.

5. Anonymous Disclosures

We encourage you to include your name when raising a concern, as it helps us follow up and gather any additional information if needed. However, we understand that some people may feel more comfortable reporting anonymously.

If you choose to remain anonymous, please know that the Flying High Partnership will still consider your disclosure. Whether or not we can investigate will depend on the information provided and it should be noted that anonymous reports may limit the ability to investigate.

When deciding whether to investigate an anonymous concern, we will consider:

a) How serious the issue is.

b) Whether the concern seems credible and well-founded.
c) Whether we can reasonably verify the concern using other reliable sources.

We want to reassure you that you will be supported if you raise a concern in good faith. Coming forward with your name helps us respond more effectively, but we will always do our best to act on concerns raised, even if they are anonymous.

6. Concerns Raised About External Individuals or Organisations Engaged by FHP

We recognise that concerns may sometimes relate to the actions of individuals or organisations outside of the partnership. For example: an agency worker, supplier, contractor or service provider.

In most cases, such concerns should be raised internally in the first instance, following the reporting channels outlined in Section 3: Raising a Whistleblowing Concern. This allows us to assess the situation promptly and determine the most appropriate course of action.

You can speak to any of the contacts listed in Section 3 or reach out to a member of the HR team for guidance at HR@flyinghightrust.co.uk.

7. Concerns Raised by External Individuals

The Flying High Partnership is committed to maintaining the highest standards of integrity and accountability. We recognise that individuals who are not directly employed by the Trust, such as contractors, agency workers, volunteers or visitors, may also witness or become aware of concerns relating to our operations.

If you are an external individual and have a genuine concern about wrongdoing or unsafe practices within the Trust, we encourage you to raise this with us. You can do so by following the reporting channels outlined in Section 3: Raising a Whistleblowing Concern.

We will treat all concerns seriously and handle them in line with the principles of this policy, including confidentiality and protection from retaliation where applicable.

8. Investigation and Outcome

Record keeping will be in compliance with UK GDPR. Whistleblowing reports and investigations will be documented and stored securely.

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 in order to provide further information.
In some cases, we may appoint an investigator or team of investigators including employees 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.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower may be subject to disciplinary action.

9. 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 and we hope you will be satisfied with any action taken.

If you are not happy with the way in which your concern has been handled, you can escalate your concerns to someone else within the reporting channels outlined in Section 3: Raising a Whistleblowing Concern or if you believe the information you have disclosed is substantially true, possible external contact points include:

- Protect – Free Confidential Independent whistleblowing advice
- Your trade union
- Relevant professional bodies or regulatory organisations:
    - NSPCC Whistleblowing Advice Line on 0800 028 0285
    - Local Authority Designated Officer (LADO) for safeguarding concerns.
- A relevant voluntary organisation
- The Police

If you do take the matter externally, you should ensure that you do not disclose confidential information. Please ensure that you check with the person dealing with your disclosure internally before divulging any information.

10. 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 who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken. You should not suffer any detrimental treatment as a result of raising a concern in good faith.

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 FHP HR Department immediately via email at HR@flyinghightrust.co.uk. 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. Anyone involved in such conduct may be subject to disciplinary action.

11. Training and Awareness

The Flying High Partnership is committed to ensuring that all staff are aware of the Whistleblowing Policy and understand how to raise concerns. Training on whistleblowing is delivered through the following channels:

a) **Induction:** All new staff members are asked to confirm they have read and understood the Whistleblowing Policy as part of their induction program.

b) **Internal Communications:** Regular updates and reminders about the Whistleblowing Policy are communicated through internal channels, including emails and staff meetings at least annually.
c) **National College Platform:** The Whistleblowing Policy training module is available on the National College training platform, accessible to all staff for ongoing reference and refresher training.
d) **Accessibility:** Policy is available in the FHP – All Staff Area using the following link:
    - Whistleblowing Policy Sept 2025.docx

12. Confidentiality Statement in Relation to Whistleblowing Disclosures

This statement should be read in conjunction with the Whistleblowing Policy (see above).

During the course of your employment, you will have access to and be entrusted with information regarding your school or the FHP, its current and prospective pupils, parents, carers, suppliers, employees, workers, contractors or consultants and their services, dealings, practices and affairs, all of which is or may be commercially sensitive or confidential information.

You will not, except in the proper course of your duties, without the previous consent of the headteacher or CEO of the FHP make use of, divulge or communicate to any person, firm or company whatsoever or otherwise make use of any confidential information concerning the business or finances of your school or the FHP or any such confidential information concerning current and prospective pupils, parents, carers, suppliers, employees, workers, associates or consultants which you knew or ought reasonably to have known to be confidential which you may have received or obtained during your employment.

This restriction shall continue to apply after the termination of your employment without a time limit but shall cease to apply to information ordered to be disclosed by a court of competent jurisdiction or otherwise required to be disclosed by law.

All documentation, e-mails, folders, programs, notes and memoranda remain the property of the FHP and shall be returned or surrendered upon termination of your employment.

You must not at any time make a copy, abstract, précis or summary of the whole or any part of any document, file or program belonging to the school or FHP except when required to do so in the course of your employment.

Any statements to reporters from newspapers, radio, television etc. will be given only by the headteacher, chair of governors, CEO of the FHP or other appointed person, and any press or media request for information must be referred in the first instance to your line manager.