



PLATANOS TRUST

WHISTLEBLOWING POLICY AND PROCEDURE

2025 - 2026

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Review procedures

This Policy is to be reviewed annually or as necessary with notification being given to the Board of Trustees on the results of any review.

If any amendments to the Policy are required as a result of a review, then these will be presented to the Board of Trustees for consideration and acceptance of the amendments.

Date reviewed:	29 August 2025
Date of next review:	28 August 2026

WHISTLEBLOWING POLICY AND PROCEDURE

1. INTRODUCTION

The Platanos Trust is committed to conducting our business 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 in order to prevent such situations occurring or to address them when they do occur.

We recognise that some concerns may be extremely sensitive and have therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure.

The provisions of the Policy apply to matters of suspected malpractice and fraud and not matters of more general grievance which would be dealt with under the schools' Grievance Policy and Procedures.

The aims of this Policy are:

- To encourage staff 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.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This Policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

2. BACKGROUND AND CONTEXT

This Policy on 'whistleblowing' has the following background and context. Any version adopted by the Trust of Trustees will form part of the Conditions of Employment.

School employees are expected to give the highest possible standard of service to the public through the performance of their duties. Employees will be expected through agreed procedures and without fear of recrimination, to bring to the attention of their line manager any deficiency in the provision of service.

Employees must report to the appropriate manager any impropriety or breach of procedure.

The legal background relating to “whistleblowing” is covered by the Public Interest Disclosure Act 1998 which affords protection against dismissal penalty where an employee discloses in good faith, with reasonable grounds for belief in the disclosure, certain information relating to the following examples:

Malpractice

Failure to comply with legal obligations
Child protection issues
Miscarriages of justice
Criminal offences
Danger to Health and Safety
Damage to the environment
Concealment of evidence relating to the above

Fraud

Manipulation of accounting records and finances
Inappropriate use of school assets or funds
Decision making for personal gain
Abuse of position to influence decisions
Fraud and deceit

This Policy sets out the agreed procedures that should be followed where employees have concerns about what they regard as such impropriety or neglect of duty. Such breaches of acceptable standards may be in relation to ethical or professional standards, as well as the school’s expectations on money, gifts, hospitality, health and safety and welfare, equal opportunities, relationships and outside interests. The Code of Conduct gives greater details.

This procedure should be used where concern is about the consequences for other employees or the public.

If the concern is about the individual being disadvantaged, by the action or failure to take action, then that should be pursued through the school’s Grievance Policy and Procedures.

3. WHAT IS WHISTLEBLOWING?

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

- Criminal activity.
- Child protection and/or safeguarding concerns.
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Financial fraud or mismanagement.
- Negligence.
- Breach of our internal policies and procedures including our Code of Conduct.
- Conduct likely to damage our reputation.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of any of the above matters.

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.

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

If staff are uncertain whether something is within the scope of this Policy you should seek advice from Human Resources.

4. RAISING A WHISTLEBLOWING CONCERN: PROCEDURE

The Trust hopes that in many cases staff will be able to raise any concerns with their Line Manager by speaking to them in person or putting the matter in writing if preferred. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to Human Resources.

Judgement will need to be exercised here if the inaction or lapse of standards seems to be minor, then it may well be sufficient just to bring the matter to the attention of the employee who appears to be at fault.

However, where the matter is more serious, or you feel that your Line Manager or Head of Department has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following by writing:

- A Senior Manager
- The Headteacher/Executive Head/CEO.
- A Governor/Trustee with responsibility for whistleblowing matters.

The Trust encourages the "whistleblower" to raise the matter internally in the first instance to allow those school staff and governors/trustees in positions of responsibility and authority the opportunity to investigate, right the wrong where necessary and give an explanation for the behaviour or activity.

The Trust will arrange a meeting with you as soon as possible to discuss your concern. Staff may bring a colleague or union representative to any meetings under this Policy who must respect the confidentiality of your disclosure and any subsequent investigation.

The Trust will take down a written summary of the concern raised and provide the member of the staff with a copy as soon as practicable after the meeting. The Trust will also aim to give you an indication of how we propose to deal with the matter.

5. WHAT SHOULD A LINE MANAGER DO WHEN A COMPLAINT IS RECEIVED?

It is essential that problems raised are tackled effectively and quickly and with the aim of righting wrongs, this may well be best achieved in many less serious cases by discussion with the

“offending” employee and securing a commitment as to future standards and corrective action. In other more serious cases, the matter may well have to be referred to a Senior Manager. It may be necessary to instigate disciplinary proceedings.

Complaints received from outside of the school environment must be dealt with by following the procedures as outlined in the Staff Code of Conduct and Concerns and Complaints Policy.

Any written complaint/allegation should be given a written acknowledgement and confirmation that the matter will be looked into. Unless clearly made in a very low key way about minor matters, verbal complaints/allegations should receive a written acknowledgement in the same way.

In the event of the allegation being of a serious nature e.g. relating to a fraud or other gross misconduct offence, there may well be a need to involve other colleagues immediately – see above. This should normally be agreed initially by the Chair of Trustees and/or the Executive Head who, in turn, should keep the relevant government department informed.

When any complaint or allegation has been looked into and resolved or dealt with, the person who raised the matter in the first instance should be notified – normally in writing unless common-sense indicates that it can be done more appropriately verbally. How much detail to provide in such cases is a matter of judgement.

6. INDIVIDUALS RECEIVING A COMPLAINT ABOUT THEMSELVES

If the complaint or allegation is at all significant or made in a formal way, particularly by a member of the public or other external users, then the line manager, or Chair of Trustees in the case of the Executive Head, should be informed even if it is believed that the complaint is groundless or unjustified.

Where a complaint or concern clearly does not justify the issue being pursued in this way, then a brief file note or diary entry will often be appropriate and in the best interests of the individual.

7. CONFIDENTIALITY

The Trust hopes that staff will feel able to voice whistleblowing concerns openly under this Policy. However, if a member of staff wants to raise his or her concern confidentially, the Trust will endeavour to keep his or her identity secret in so far as it is possible to do when following this policy and procedure. If it is necessary for anyone investigating that member of staff's concern to know your identity, the Trust will discuss this with the member of staff first. All matters will be treated in strict confidence.

The Trust does not encourage staff to make disclosures anonymously and the Trust will not normally respond to anonymous allegations. Proper investigation may be more difficult or impossible if the Trust cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

In more serious cases where disciplinary action may have to be taken against an individual, it may well be judged that they have a right to know the source as well as the nature of such complaints. In any case the Trust is committed to doing as much as possible to ensure that the well-being of the “whistleblower” at work does not suffer as a result of the tensions that may result from the making of or investigation of complaints.

Individuals are encouraged to bring to the attention of their managers any harassment or victimisation they may suffer as a result of whistle blowing. All necessary action will be taken to ensure that such harassment or victimisation is stopped.

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:

Public Concern at Work
Suite 306
16 Baldwin Gardens
London EC1N 7RJ

Helpline: (020) 7404 6609
E-mail: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

8. EXTERNAL DISCLOSURES

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

Staff are expected to report such concerns by exhausting internal procedures first.

The law recognises that in some circumstances it may be appropriate for staff to report his or her concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are detailed in this Policy.

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a service provider. The law allows staff to raise a concern in good faith with a third party, where the member of staff reasonably believe it relates mainly to their actions or something that is legally their responsibility.

9. INVESTIGATION AND OUTCOME

Once a member of staff has raised a concern, the Trust will carry out an initial assessment to determine the scope of any investigation. The Trust will inform you of the outcome of its assessment. The member of staff raising the concern may be required to attend additional meetings in order to provide further information.

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

The Trust will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Trust from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

If the Trust concludes that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action under the Disciplinary Policy and Procedure.

While the Trust cannot always guarantee the outcome a particular member of staff is seeking, the Trust will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he/she can raise it with one of the other key contacts outlined above.

10. MALICIOUS ACCUSATIONS

If on investigation, it is considered that an individual has made malicious allegations without any real substance, then these too will be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances. The action will be in accordance to the Disciplinary Policy and Procedure.

11. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Trust aims 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.

Staff must 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 a member of staff believes that he or she has suffered any such treatment, he/she should inform the Headteacher immediately. If the matter is not remedied the member of staff should raise it formally using the Grievance Policy and Procedures.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

All staff are responsible for the success of this Policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Human Resources in the first instance.

12. SUMMARY

Existing good practice within the school in terms of its systems of internal control, both financial and non-financial and the external regulatory environment in which the school operates will ensure that cases of malpractice rarely occur. This Policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally, and if necessary outside the management structure of the school. This document is a public commitment by the Trust that concerns are taken seriously and will be actioned.