University Schools Trust
A transformational education

Whistleblowing Policy

June 2026

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0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
June 2026	4.2	Added sexual harrassment as a protected disclosure topic
	11	Added details regarding the limitations of non-disclosure conditions when considering whistleblowing on matters of public interest
November 2024	17	Updated to clarify possible reporting lines for disclosures, particualrly in relation to Trustee involvement.
November 2023	N/A	No changes
December 2022	7	Updated to include additional clarification about whistleblowing in relation to safeguarding procedure concerns and how to action concerns inside and external to the organisation.
August 2022	All	Update to new brand

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1. Definitions

A "School" refers to the individual academies within the Trust. Depending on the context this may refer to a singular academy or to all of the academies within the Trust but as separate entities.

The "Trust" refers to all schools within the University Schools Trust, East London and all Trustees, Governors staff and employees and who work within it.

The "Employee/Staff" refers to all employees, workers as well as those individuals who operate on the schools' behalf, e.g. Trustees and Governors. The extended meaning of the "worker" is defined under Section 43K of the Employment Rights Act 1996 (as amended by the Public Disclosure Act 1998). For the purposes of this policy," employees and staff" refers to both employees and workers of the Trust. "Workers" can be defined as contractors providing services to the Trust, most agency workers, home workers and trainees on vocational or work experience schemes

The "Headteacher" is defined as the individual who has ultimate responsibility for a school. Individual schools may have alternative titles such as Executive Headteacher.

2. Scope of the Policy

This policy applies to all employees and workers as well as Trustees and Governors as defined under Section 1.

3. Policy Aims and Ethos

The Trust is committed to the highest possible standards of probity and accountability. Employees of the Trust are expected to conduct the business of the Trust and their roles and responsibilities with integrity and honesty. Employees are therefore required to report any wrongdoing that falls short of these principles. The purpose of this policy is to enable employee to raise concerns about the conduct of other colleagues in a confidential manner.

This policy aims to:

- Provide a process for employees to raise concerns about wrong doings (known as "protected disclosures") in the workplace;
- Reassure employees that where they raise a concern, which they reasonably believe to be in the public interest, this will be handled seriously and as confidentially as possible without reprisals (even if they turn out to be mistaken); and
- Promote a culture of openness, honesty accountability throughout the Trust, reducing the risk of serious malpractice occurring.

The Trust is aware that it can be very difficult for employees to report any wrongdoing that they become aware of, especially if it involves senior staff. Employees may have concerns about their employment and how they may be treated if the raises any wrongdoing. However, the Trust needs to be aware of any wrongdoing so steps can be taken to address it. Employees should be assured that the Trust will respond to any whistleblowing disclosures sensitively and with care. Employees will be kept informed appropriately and in accordance with Data Protection laws as to what steps are being taken to investigate and resolve the issue/s.

In the spirit of openness, transparency and fairness to all parties, the Trust does not actively encourage anonymous complaints to be made and cannot guarantee that an anonymous complaint will be investigated and/or responded to. Any anonymous complaints will be considered in accordance with section 6 of this policy.

The specific process for dealing with an employee concern is contained in Appendix 2.

4. Links to Legislation and Guidance Documents

4.1. Relevant Internal Policies

This policy should be read in conjunction with the following policies:

- Grievance Policy and Procedure
- Disciplinary Policy and Procedure
- Well-Being Policy
- Code of Conduct
- Health and Safety Policy
- Child Protection and Safeguarding Policies

Any employee does not have to provide evidence of allegations in order for the Trust to investigate a disclosure.

The Trust will not tolerate any harassment or victimisation. Employees who raise genuine concerns, that they reasonably believe to be in the public interest and in line with this policy, are protected from detrimental treatment under employment legislation. These legal protections apply even if an investigation confirms that there is no evidence to support the allegation and therefore no further actions required.

Employees who make disclosures maliciously, or make disclosures, which are personal grievances against to the individuals, will not receive this legal protection and may face disciplinary action as a result.

Complaints relating to an employee's individual circumstances or in relation to a member of staff's behaviour and conduct are not covered in the above list. These matters should be raised under the Trust's Grievance Policy and Procedure.

If an employee or member is unsure as to whether a concern should be raised under this policy, or needs guidance on how to raise such a concern, the charity, Protect (formerly known as Public Concern at Work) can provide independent and confidential advice. Refer to Appendix 1 for contact details.
A disclosure does not need to state that it is a disclosure under the Public Interest Disclosure Act 1998. Those named as responsible persons to receive a disclosure will determine if it is a whistleblowing disclosure and act accordingly. In circumstances where it is unclear whether the employee is raising a complaint or disclosure, the Chair of the Risk and Audit Committee will make the final determination, based on the evidence provided to them from either a fact-finding process or informal investigation.

4.2. Relevant External Documents - The Legal Background

Whistleblowing is a specific type of disclosure where an individual, acting on good grounds and in the public interest and reasonably believes that one or more of the following is taking place, has taken place or will take place:

- a criminal offence
- failure to comply with a legal obligation
- a danger to health and safety
- damage to the environment
- breaches of financial management
- sexual harassment
- deliberate concealment of information relating to any of the above

The Public Interest Disclosure Act 1998 sets out a framework for "Public Interest" whistleblowing and gives legislative protection for whistleblowers where there is a qualifying disclosure as described in Section 12. There is no qualifying period for the protection of workers who make a protected disclosure and no upper limit on the level of compensation that can be awarded.

To gain the protection of the law, the employee must make their disclosure following one of a number of prescribed routes, in particular:

- Disclosure to your employer
- Disclosure to a legal adviser
- Disclosure to a prescribed person (Section 9) Other relevant legislation is the:
- Employment Rights Act 1996
- Enterprise and Regulatory Reform Act 2013
- Protected Disclosures Act 2014

5. Roles and Responsibilities

5.1. Trust Board

The "Trust Board" will review and agree the policy as well as, with the relevant committees, monitor all outcomes.

5.2. Chair of Trustees/Governors, the Trust Leader and Headteacher/s

The "Chair of Trustees/Governors, the Trust Leader and Headteacher/s" will ensure the policy is implemented and complied with across the school/Trust. They will ensure they seek appropriate advice on all concerns reported to them and that the concern is escalated and/or investigated and dealt with appropriately.

5.3. Designated Policy Lead

The "Designated Policy Lead" for the Trust will ensure that the policy is periodically reviewed and updated.

5.4. HR Staff

"HR Staff" will support the implementation, monitoring, review and compliance of the policy. HR will give advice and guidance as appropriate.

5.5. Employees/ Staff

All "Employees/Staff" will comply with the policy and agreed procedure, as appropriate.

6. Anonymity and Confidentiality

Employees are encouraged to raise concerns openly, which makes it easier for the Trust access the issue, decide how to investigate and obtain more information. As far as possible, the Trust will protect the identity of an employee who has raised a concern and does not want their name revealed. However, an investigation process may reveal the employee's identity especially if a statement by the person reporting the concern is required as evidence. Employees may also be required to give evidence at disciplinary hearings or to act as a witness in court.

While the Trust does not actively encourage staff to make anonymous disclosures, if an anonymous disclosure is received, the Trust will assess the information provided in the best way it can. The Trust will consider:

- the specific nature, credibility and seriousness of the allegation/s,
- whether it can undertake a reasonable investigation and assess the likelihood of being able to confirm the allegations from verifiable sources,
- any duty of care owed to the employee/s who the allegation/s are against

However, making a disclosure anonymously will limit the Trust's ability to investigate and provide feedback on the information received. The Trust cannot guarantee that an anonymous complaint will be acknowledged or responded to. It may also be more difficult for an employee who has made an anonymous disclosure to qualify for legal protections given to whistleblowers.

7. Keeping Children Safe

For the avoidance of doubt, nothing within this policy is intended to prevent staff from complying with their obligations in accordance with the Trust's safeguarding policies and the DfE's current statutory guidance - Keeping Children Safe In Education.

All staff working within the Trust must report any safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported to the Trust or School's Designated Safeguarding Lead (DSL).

Whistleblowing procedures are in place to allow concerns about poor or unsafe practice and potential failures in the school's safeguarding system to be raised with the Leadership.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the organisation, or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the LADO.

8. Raising a Whistleblowing Concern

The Trust's specific process for dealing with an employee concern is set out in Appendix 2.

9. Contact with External Bodies

This policy is designed to support a culture of transparency and accountability where employees feel able to raise concerns about potential illegal and unethical activity. The law does, however, recognise that is exceptional circumstances, it may be appropriate for employees to raise concerns directly with bodies and persons known as "prescribed persons". These include regulatory agencies such as the Office for Standards in Education (Ofsted) and the Education and Skills Funding Agency (ESFA). A complete list of "prescribed persons" can be found on the relevant government website.

Employees may also wish to seek advice from:

- Their Trade Union or Professional Body
- The Police
- A Solicitor/Legal Adviser
- The Health and Safety Executive
- The Citizens' Advice Bureau
- The Regional schools' Commissioner

Employees are strongly advised to seek advice from Protect (formerly Public Concern At Work) before making a disclosure to an external body. Refer to Appendix 1 for contact details.

10. Contact with the Media

The Trust does not condone employees contacting the media in relation to any suspected wrongdoing in the workplace. Employees who do so are very likely to lose their legal whistleblowing protections and may face disciplinary action, up to and including termination of employment for gross misconduct.

11. Protection for the Whistleblower

No employee will suffer detrimental treatment for having raised a concern, made in reasonable belief that it was in the public interest, and as long as the concern has been raised with the Trust or with an appropriate external body or person as set out in Sections 4.1 and 9. Employees will be advised who to notify should they consider they are being subject to detrimental treatment.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Should there be evidence that an employee is suffering or had suffered detrimental treatment as a result of making a protected disclosure, appropriate action, including disciplinary action, may be taken against that person/s.

A non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or contract cannot stop a member of staff from making a protected disclosure in the public interest.

12. Dissatisfaction with the Trust's Response

Other than in exceptional circumstances, employees are expected to raise their concerns through internal routes first and the Trust will manage the investigation associated processes fairly and properly. Following the internal investigation process and notification of the outcome, if an

employee is not satisfied with the response received, the matter can be escalated with the external bodies as outlined in Section 9.

13. Monitoring and Review

The Trust has a responsibility for registering the nature of all concerns raised and recording the outcome.

14. Further Advice

For further advice and guidance on the implementation of this policy, please contact the Operational Manager-HR and/or the School's HR Manager/HR Adviser in the first instance. Any advice and guidance required with regards to the interpretation of this policy, will be referred to the Director of Human Resources.

15. Approval Signature

Signature of (enter position e.g. Chair) _____

Print name _____

Date _____

16. Appendix 1 – Key Members of Staff Referenced

Role	Member of Staff	Contact
Trust Leader	Gillian Kemp	gkemp@ust.london
Director of HR	Lynsey Jackson	Ljackson@ust.london
Director of Education - Operations	Darren Kulesza- Smith	dsmith@ust.london
Chair of Trustees	Prof Peter Heathcote	pheathcote@ust.london
Whistleblowing Trustee	Simon Hall	simon.hall@ust.london
Chair of CJPS School Committee	Sue Stollery	sstollery@ust.london
Chair of RGTS School Committee	Simon Lewis	slewis@ust.london
Chair of SPWT School Committee	Dr Joe Hall	joe.hall@ust.london
Chair of SWB School Committee	Ross Tranter	rtranter@ust.london
Headteacher – CJPS	Hodo Dirir	h.dirir@cyriljackson.towerhamlets.sch.uk
Headteacher – RGTS	Asma Khan	khan.a@rgtrustschool.net
Head of School SPWT (secondary)	Firdusi Uddin	Fuddin@spwt.net
Exec. Headteacher – SWB & SPWP	Siobhan Fehim	Sfehim@spwt.net
Protect	020 3117 2520	https://protect-advice.org.uk

17. Appendix 2 – The Process

17.1. How To Raise A Concern

An employee should raise/notify the concern in accordance with the process set out below:
The following steps must be undertaken prior to any fact finding or investigation process-taking place.

17.1.1. Step One

If an employee wishes to make a protected disclosure, wherever possible, it should be raised first with their direct line manager and preferably in writing. The manager must notify their Headteacher, or, in the case of central staff, the Trust Leader of the disclosure within 24 hours of receipt of it.

17.1.2. Step Two (School based staff only)

If an employee feels that Step One is not suitable, for whatever reason, it should be raised with a member of the school's senior leadership team or Headteacher. For centrally employed staff, the concern should be raised with a member of the UST Executive or the Trust Leader.

Any member of the school's senior leadership team must notify their Headteacher of the disclosure within 24 hours of receipt of it. The Headteacher must notify their Chair of Governors and the Trust Leader of the disclosure within 24 hours of receipt of it.

17.1.3. Step Three

If an employee feels that Steps One to Two are not suitable, for whatever reason, it should be raised with a member of the UST Executive or the Trust Leader.

A member of the UST Executive must notify the Trust Leader of the disclosure within 24 hours of receipt of it, who in turn may consider it necessary to notify the nominated Whistleblowing Trustee.

17.1.4. Step Four

If an employee feels that Steps One to Three are not suitable, for whatever reason, the matter should be raised with the Chair of Governors (of the relevant school) or for central staff the nominated Whistleblowing Trustee.

Should a disclosure be received by a Chair of Governors, this must be reported to the Trust Leader and the relevant Headteacher within 24 hours of receipt of it, unless the disclosure involves allegations of malpractice against the Trust Leader and/or Headteacher. In these circumstances, the disclosure will be reported to the nominated Whistleblowing Trustee.

Should a disclosure be received by the nominated Whistleblowing Trustee then this must be reported to the Trust Leader within 24 hours of receipt of it, and if relevant, to the Headteacher of the relevant school unless the disclosure involves allegations of malpractice against the Headteacher and/or Trust leader.

If the concern relates to the nominated Whistleblowing Trustee, the Chair of Trustees should be contacted in their place.

An acknowledgement will be given in writing to the employee within 5 working days of the date the concern was raised.

Concerns may be raised verbally but will be more effective if employees set out their concerns in writing.
A verbal or written disclosure should set out:

- The background and history of the concerns (giving relevant names, dates and places where possible)
- The reason why the employee is particularly concerned about the situation
- Details of any possible witnesses to the concerns
- The employee is not expected to prove beyond doubt whether or not the allegation is true or not. However, they will need to demonstrate to the person that raise the concern with that there are sufficient and reasonable grounds for their concern and that they are therefore making the disclosure in good faith.

17.2. Support for the Employee

The employee may contact their Trade Union representative and/or the Employee Assistance Provider (or one of the external bodies mentioned in Section 9), if additional support is needed. The School's HR team can provide the relevant details for the Employee Assistance Provider.

17.3. Investigation Process

When a whistleblowing concern is raised, the Trust will instigate an investigation, which may initially be viewed as a more informal fact-finding investigation.

Where the matter can be investigated internally, an appropriate person (Investigating Officer) will be appointed as soon as practicable to undertake either a fact finding or a more formal investigation process. It may be that the concern can be resolved without the need for one or both of these processes. Where considered necessary and appropriate, an external Investigating Officer may be appointed, which will normally be where a more formal and detailed investigation is required. Any concern raised will be investigated thoroughly and in a sensitive manner.

The Investigating Officer will arrange a meeting with the individual as soon as practicable to discuss their disclosure. The Trust will endeavour to keep the individual informed of the progress of the investigations and its likely timescale for completion. The investigation will be undertaken as swiftly as possible and once a decision is made as to whether the nature of the disclosure requires an initial fact-finding exercise, a more formal investigation or needs to be referred immediately to the police or external auditor. Where a safeguarding issue is reported, it may be more appropriate to follow the normal safeguarding procedures when dealing with allegations of abuse against teachers and other staff, referring to Section 7 – Keeping Children Safe in Education. The timescale for completion of the investigation and the subsequent outcome process may vary depending on the complexity of the disclosure.

The employee will be required to participate fully in the investigation process and may be asked to provide further information.

Sometimes the need for confidentiality may prevent the Trust providing specific details of the investigation or any disciplinary action taken as a result. Individuals should treat any information about the investigation confidential and any breach of this confidentiality may in itself result in disciplinary action.

Any employee making a disclosure is entitled to be accompanied to any investigation meetings by a work colleague or Trade Union representative. Individuals acting in this support role must also adhere to the confidentially provision of this policy.

The person/persons about whom the disclosure was made, will be informed of the disclosure. They will be informed of the allegations made, provided with any supporting evidence and be given the opportunity to respond. They will also have the right to be accompanied to any investigation meetings by a Trade Union representative or work colleague. Both they and their representative will also be bound by the confidentially provisions of this policy document, including potential disciplinary action for any breach of confidentiality

Within 10 working days of the acknowledgment being sent to the employee, the employee will be written to, setting out:

- How the matter will be dealt with
- Who will be managing the process
- Who the Investigating Officer will be
- Their right to be accompanied to any investigation interviews
- Details of the other support available
- An estimate of when the fact-finding /investigation process will commence and how long the process will take until a final outcome is known.
- The need for confidentiality during the process and the potential consequences of breaching this requirement

If a decision is made that no fact-finding or investigation process is required, this will be explained to the whistleblower.

It is anticipated that a fact-finding exercise shall take no more than 10 working days to complete. If a longer time period is required, this will be explained to the employee.

As set out above, the timescale for a more formal investigation or external enquiry may vary and the employee will be updated on the progress and estimated timescale.

The Investigating Officer will report their findings to the appointed manager. This person will then decide, in the case of an informal fact-finding investigation, if the matter warrants a more detailed and formal investigation, before an outcome can be decided.

The individual receiving the investigation report will make a formal decision on whether the whistleblowing disclosure is upheld or not and, what if any, further action is required. HR and other relevant advice may be required to support this decision-making process.

Records of the investigation will be kept for six-years by the HR Service. Records will include details of the decision made as a result of the investigation and outcome of any subsequent actions taken.

17.4. Investigation Outcome

The employee will be notified of the outcome of the fact finding/formal investigation within 10 working days of the outcome being decided, i.e. whether their disclosure has been upheld or not (or partially upheld) or whether (in the case of a fact finding exercise), a fuller and more formal investigation is required. The reasons for the outcome will be fully explained to the employee.

The employee may be required to participate in further proceedings as a result of the outcome including disciplinary hearings and court attendance.

Due to the need for confidentiality and data protection laws, the employee may not be informed of the outcome of any internal disciplinary action that may be required.

17.5. Next Steps

There is no internal right of appeal against the agreed outcome.

In accordance with Sections 9 and 12, the employee has the right to refer this matter to an external body. In doing so, the employee must as far as possible to ensure their concern/s is raised without confidential information being divulged. The employee is advised to seek appropriate advice to ensure that a breach of confidentiality does not occur.