

Whistleblowing Policy

Adopted by SEEAT Board: October 2026
Next Review: October 2027

1 SCOPE AND PURPOSE

1.1 South East Essex Academy Trust is committed to conducting itself with honesty and integrity, and it expects all staff 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.

1.2 The aims of this policy are:

1.2.1 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;

1.2.2 to provide staff with guidance as to how to raise those concerns; and

1.2.3 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.

1.3 This policy does not form part of any employee's contract of employment, and it may be amended at any time.

WHO IS COVERED BY THIS POLICY?

1.4 This policy applies to all individuals working at all levels of SEEAT, including officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers

2 WHO IS RESPONSIBLE FOR THE POLICY?

2.1 The Trust Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The CEO has day-to-day operational responsibility for this policy, which may be delegated to another member of the Executive Leadership Team, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

3 WHAT IS WHISTLEBLOWING?

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

3.1.1 criminal activity;

3.1.2 miscarriages of justice;

3.1.3 danger to health and safety;

3.1.4 damage to the environment;

3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;

3.1.6 bribery;

3.1.7 financial fraud or mismanagement;

3.1.8 negligence;

3.1.9 breach of internal policies and procedures;

3.1.10 conduct likely to damage the School's or Trust's reputation;

3.1.11 unauthorised disclosure of confidential information;

3.1.12 concerns about the harm or risk of harm to children;

3.1.13 the deliberate concealment of any of the above matters.

3.2 A whistleblower is an individual who raises a genuine concern related to any of the above. If a member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of the Schools' or Trust's activities (a whistleblowing concern) they should report it under this policy.

3.3 This policy should only be used when the whistleblower has a reasonable belief that the disclosure is in the public interest. This policy should not be used for complaints relating to an individual's own personal circumstances, such as the way they have been treated at work. In those cases, the individual should use the SEEAT Grievance Procedure or Complaints Procedure as appropriate.

3.4 If an individual is uncertain whether something is within the scope of this policy, they should seek advice from a Whistleblowing Officer, whose contact details are at the end of this policy.

4 RAISING A WHISTLEBLOWING CONCERN

4.1 SEEAT hopes that in many cases staff will be able to raise any concerns with their line manager, the Senior Leadership Team or Head Teacher. A member of staff may tell them in person or put the matter in writing if they prefer. They may be able to agree on a way of resolving the member of staff's concern quickly and effectively.

4.2 However, where the matter is more serious, or the member of staff feels that their line manager, the Senior Leadership Team or the Head Teacher has not addressed the

concern, or they prefer not to raise it with them for any reason, they should contact a Whistleblowing Officer. Contact details are set out at the end of this policy.

5 CONFIDENTIALITY

5.1 SEEAT hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if a whistleblower wants to raise a concern confidentially, the Trust will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know the whistleblower's identity, the Whistleblowing Officer will discuss this with them.

5.2 SEEAT does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information from the member of staff raising the concern. 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 a Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If a member of staff is in any doubt, they can seek advice from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this policy.

6 INVESTIGATION AND OUTCOME

6.1 Once a whistleblower has raised a concern, the Headteacher or a Whistleblowing Officer will arrange a meeting with them within 2 working days to discuss their concern. A whistleblower may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

6.2 The Headteacher or Whistleblowing Officer will take down a written summary of the whistleblower's concern and provide them with a copy after the meeting. They will also aim to provide an indication of how they propose to deal with the matter.

6.3 The Headteacher or Whistleblowing Officer will carry out an initial assessment to determine the scope of any investigation and will inform the whistleblower of the outcome of their assessment within 10 working days. The whistleblower may be required to attend additional meetings in order to provide further information.

6.4 In some cases, SEEAT 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 SEEAT to minimise the risk of future wrongdoing.

6.5 Conclusions will usually be reported within 28 working days of the disclosure. The Headteacher or Whistleblowing Officer will aim to keep the member of staff who raised the concern informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the whistleblower being

given specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation should be treated as confidential.

6.6 Possible outcomes include, but are not limited to, resolution, further internal or external investigation, referral to external agencies or no further action.

6.7 If the Trust concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

7 IF A MEMBER OF STAFF IS NOT SATISFIED

7.1 Whilst SEEAT cannot always guarantee the outcome the member of staff raising the complaint may be seeking, we will deal with the concern fairly and in an appropriate way.

7.2 If a member of staff is not happy with the way in which their concern has been handled, they can appeal to the Chair of Trustees via the Governance Professional, clerk@seeat.org.

8 EXTERNAL DISCLOSURES

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

8.2 The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator. It will very rarely, if ever be appropriate to alert the media. The Trust strongly encourages individuals to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

8.3 Whistleblowing concerns usually relate to the conduct of SEEAT 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 individuals if they raise the matter with the third party directly. However, SEEAT encourages staff to report such concerns internally first. Staff should contact their line manager, the Senior Leadership Team or a Whistleblowing Officer for guidance.

9 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. SEEAT aims to encourage openness and will support individuals who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 Whistleblowers must not suffer any detrimental treatment because of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action,

threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform a Whistleblowing Officer immediately. If the matter is not remedied, they should raise it formally using the SEEAT Grievance Procedure.

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

10 CONTACTS

Primary Whistleblowing Officers	Andrew Cooper, CEO andrew.cooper@seeat.org Jade Blackburn, Deputy CEO and Director of People and Operations jade.blackburn@seeat.org Neal Misell, Chair of SEEAT Board via clerk@seeat.org
Whistleblowing Officers	Louise Davy, Director of Finance & CFO Louise.davy@seeat.org Toni Kittle, Chief Education Officer Toni.Kittle@seeat.org Chris Dawson, Head of Estates Chris.dawson@seeat.org
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/