



The
Leaf Trust

Unique Primary Schools Growing Together.

This policy covers all schools within The Leaf Trust

Speak Up and Whistleblowing Policy

Statutory

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(This policy supersedes all previous versions)

History of Most Recent Policy Changes

Version	Date	Page	Change	Comments
V 1.0	04 November 2024	Whole Document	New Policy	Developed to comply with requirements outlined in the Academies Trust Handbook (Sections 2.44, 2.45, and 2.47) for implementing and publishing a whistleblowing procedure. These sections mandate that the trust must have procedures to protect whistleblowers, with trustee approval and contact points for reporting concerns.
V2.0	03 November 2025	Whole Document	Policy reviewed in full. Updates made to: Section 7.3 – response time extended from 5 to 10 working days. Section 8.2 – updated to include reference to external auditors. Internal contact list updated.	Scheduled review
V2.1	February 2026	Appendix	Interim update - Appendix 1 updated to include new contact details.	

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1.0 Introduction

1.1 Commitment to Speaking Up

The Leaf Trust is committed to fostering a culture of openness and accountability where all employees, workers, and volunteers feel empowered to **speak up** about any concerns regarding wrongdoing or risks in the workplace. The Trust values honesty and integrity and expects all staff to uphold these principles in line with the Staff Code of Conduct Policy.

We recognise that issues may arise from time to time. It is essential that everyone feels safe and supported when raising concerns.

1.2 Zero Tolerance for Misconduct

The Trust maintains a zero-tolerance stance on unethical or unlawful behaviour, including harassment, fraud, and breaches of policy. Concerns raised under this Policy will be taken seriously, handled promptly and addressed confidentially where possible.

Raising a concern through this policy helps issues to be resolved internally without unnecessary public disclosure.

1.3 Legal Framework

This policy is designed in accordance with the Public Interest Disclosure Act 1998 and relevant provisions of the Academies Trust Handbook.

1.4 Policy Status

This policy is a non-contractual document and does not form part of any employee's terms and conditions of employment or other service agreements. The Trust reserves the right to review and update this policy at its discretion to ensure it remains effective and relevant.

2.0 Scope and Purpose

2.1 Purpose of the Policy

The aims of this **Speak Up and Whistleblowing Policy** are to:

- Encourage staff to report suspected wrongdoing promptly, with confidence that concerns will be taken seriously, investigated appropriately, and handled confidentially.
- Provide clear guidance on how to raise concerns.
- Reassure staff that they can raise genuine concerns made in the public interest without fear of reprisals, even if the concerns prove to be unfounded.

2.2 Scope of the Policy

This policy addresses concerns that fall outside the scope of other formal procedures, such as disciplinary or grievance processes, which are designed to manage individual employment matters. It may also overlap with related policies, such as those addressing complaints, safeguarding, or fostering positive working relationships within the Trust.

This policy does not provide recourse for disagreements over strategic or operational decisions made by the Trust or its schools.

2.3 Who is Covered?

For the purposes of this policy, the term 'staff' includes employees, workers, trustees, governors, contractors, agency staff and volunteers.

3.0 What is Whistleblowing

3.1 Speaking Up in the Public Interest

Whistleblowing refers to the disclosure of information about suspected wrongdoing or dangers at work. The law protects workers who raise legitimate concerns about specific matters, known as "qualifying disclosures."

To qualify as whistleblowing, the disclosure must:

- Be made in the **public interest**, meaning it affects others beyond personal circumstances—such as pupils, colleagues, or the general public.
- Be made with a **reasonable belief** that the wrongdoing or danger is genuine.

Examples of qualifying disclosures include:

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with legal, professional, or regulatory obligations;
- Bribery;
- Financial fraud or mismanagement;
- Gross negligence;
- Breaches of internal policies, including the Staff Code of Conduct Policy;
- Conduct likely to damage the Trust's reputation or financial wellbeing;
- Unauthorised disclosure of confidential information;
- Unethical behaviour; and
- The deliberate concealment of any of the above matters.

3.2 What is a Whistleblower?

A whistleblower is a member of staff who raises a genuine concern about suspected wrongdoing, risks, or dangers that affect the Trust, one of its schools, or its activities. These concerns may relate to criminal offences, breaches of legal or regulatory obligations, health and safety risks, unethical behaviour, or the examples outlined in Section 3.1.

If you have a reasonable belief that the concern is in the public interest and relates to the Trust's operations, you are strongly encouraged to raise it under this policy.

3.3 Personal Grievances

This policy is not intended for complaints about personal circumstances, such as disputes over treatment at work. Such issues should be addressed using the **Grievance Policy** or **Anti-Harassment & Bullying Policy**.

However, if a personal complaint also involves wider concerns (e.g., breaches of internal policies), you should discuss with your Headteacher or line manager which route is most appropriate.

3.4 Safeguarding Concerns

If your concern relates to safeguarding and the welfare of students within a school, you should consider whether the matter is better raised under the **school's child protection policy** and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in this policy may still apply. **Nothing in this policy overrides the statutory safeguarding duty to refer a child at risk of harm to social care or the police. Anyone may make a referral.**

3.5 Seeking Advice

If you are uncertain whether your concern falls under this policy, consult your Headteacher or line manager for guidance.

3.6 Modern Slavery

The Leaf Trust is committed to the prevention of modern slavery, including forced labour, human trafficking, and exploitation. Concerns relating to potential instances of modern slavery—whether involving staff, students, suppliers, or other individuals—may fall under this whistleblowing policy if they raise wider public interest issues.

If you suspect that modern slavery may be occurring, or if you believe you may be a victim, you should raise your concern immediately with your Headteacher, line manager, or another contact listed in Section 4. In serious cases, you should also notify the police.

For independent and confidential advice, you may contact the Modern Slavery Helpline on **0800 0121 700**. You may also refer to the Trust's Modern Slavery Statement for more information.

3.7 External Guidance

Protect (formerly Public Concern at Work) provides guidance on distinguishing between whistleblowing concerns and grievances.

They also offer a free and confidential [Advice Line](#) for individuals requiring additional support.

4.0 Raising a Whistleblowing Concern

4.1 We hope that you will feel able to raise any concerns with your line manager, as they may be able to agree a way of resolving your concern quickly and effectively. You may do so in person or in writing, whichever you prefer.

4.2 However, where the matter is more serious, your line manager has not addressed your concern, you prefer not to raise it with them for any reason, or they are the subject of the concern, you can raise the matter—using the form in **Appendix 3**—with:

- The **Headteacher, Head of School or Executive Headteacher** if the reporting employee works within a school. Where an employee of a school feels that reporting their concerns to the Headteacher, Head of School or Executive Headteacher would be inappropriate, they should report to the Trust contact.
- The **CEO** if the reporting employee is a member of the Executive Team or is employed within the central team of the trust. Where reporting to the CEO is inappropriate, the reporting employee should contact the Chair of Trustees.

- Concerns may be reported to the **Chair of Trustees** where a complaint relates to the CEO.

4.3 Contact details are set out at the end of this policy.

4.4 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.

4.5 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.

5.0 Confidentiality and Data Protection

5.1 We hope that staff 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 secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 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 one of the other contact points listed in paragraph 4.2 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are given at the end of this policy.

5.3 Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable taking into account:

5.3.1 the seriousness of the issue raised

5.3.2 the credibility of the concern; and

5.3.3 the likelihood of confirming the allegation from other sources

5.4 As part of the application of this policy, the Trust may collect, process and store personal data in accordance with our data protection policy.

We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our [Staff Privacy Notice](#), our [Record Retention & Deletion Policy](#) and in line with the requirements of Data Protection Legislation.

6.0 Escalating Concerns Beyond Our Trust (external disclosures)

- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 6.2 The law recognises that in some 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. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect holds a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy
- 6.3 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 contractor, supplier or service provider. In some circumstances the law will protect you if you raise a concern with the third party directly where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4.2 for guidance.

7.0 Investigation and Outcome

- 7.1 Once you have raised a concern, we will carry out an initial assessment to determine the appropriate course of action and whether a formal investigation is required.
We will inform you of the outcome of this assessment. You may be required to attend further meetings to provide additional information.
- 7.2 In some cases, we may appoint an investigating officer or team of investigators, including staff with relevant experience or subject matter expertise. Where appropriate, an external investigator may be appointed. The investigators will gather and assess the relevant facts and may make recommendations for action to minimise the risk of future wrongdoing. These recommendations will be shared with the relevant Headteacher, Executive Team, Local Governing Body, or Trust Board, as appropriate.
- 7.3 Within **10 working days** of receiving your concern, the named contact or investigating officer will:
 - Acknowledge receipt of your concern
 - Outline how it is proposed to deal with the matter
 - Provide an estimated timescale for the next steps
 - Offer information on available support and employee wellbeing mechanisms where required

During periods of school closure or holidays, this timeframe may take longer if key staff members are unavailable.

- 7.4 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, in some cases, confidentiality requirements may limit the information we can share, particularly regarding specific outcomes or any disciplinary actions. Any information shared with you must be treated as confidential.

- 7.5 If it is found that a concern has been raised maliciously or knowingly based on false information, this will be treated as a disciplinary matter.
- 7.6 The Trust is committed to continuous improvement. Where whistleblowing concerns are upheld, lessons learned will be reviewed by the **Audit & Risk Committee** and used to inform improvements in policy, systems, or practice across the Trust. The Committee will ensure that any necessary actions are implemented and monitored for effectiveness. Feedback may also inform staff training or leadership development where appropriate.

8.0 If You Are Not Satisfied

- 8.1 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.
- 8.2 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 in paragraph 4.2. Alternatively, you may contact the Chair of Trustees or our external auditors. Contact details are set out at the end of this policy.

9.0 The Role of Trade Unions

- 9.1 Trade unions recognised by the Trust are committed to the effective use of this policy. If you are considering raising concerns using this procedure you may wish to seek advice from your trade union representative before doing so, particularly if you believe that the only course of action open to you is to raise your concern with an external body.

10.0 Protection and Support for Whistleblowers

- 10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 Staff must not suffer any detrimental treatment as a result of raising a genuine 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 one of the contact people in paragraph 4.2 immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 10.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.
- 10.4 A confidential counselling hotline is available to all staff. Contact details are available via the school or the [Mylifestyle Portal](#).

11.0 Malicious and Vexatious Allegations

- 11.1 Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern. If, however, an allegation is shown to be deliberately invented or malicious, the Trust will consider whether any disciplinary action is appropriate against the person making the allegation.

12.0 Related Policies

- 12.1 Related policies and documents
- Acceptable Use Policy
 - Anti-Fraud and Corruption Policy
 - Anti-harassment & Anti-Bullying Policy
 - Conflicts of Interest Policy
 - Data Protection Policy
 - Disciplinary Policy
 - Equality and Diversity Policy
 - Expenses Policy
 - Financial Regulations Policy
 - Gifts & Hospitality Policy
 - Grievance Policy
 - Health and Safety Policy
 - Pay Policy
 - Tendering and Procurement Policy
 - Allegations Against a Staff
 - Safeguarding Policy

13.0 Review of Policy

- 13.1 This policy is reviewed and amended annually by the Trust in consultation with the recognised trade unions. We will monitor the application and outcomes of this policy to ensure it is working effectively.

Appendix 1: Internal Whistleblowing Contacts

School	Position Name Contact Details
Blackhorse Primary School	Executive Headteacher: Simon Botten simon.botten@blackhorsepri.org.uk Head of School: Neil Fry neil.fry@blackhorsepri.org.uk
Bowsland Green Primary School	Headteacher: James Ridd james.ridd@bowsland.org.uk
Cadbury Heath Primary School	Headteacher: Matt Hillier-Brown Matthew.Hillier-Brown@cadburyheathprimary.org.uk
Crossways Schools	Headteacher: Jo Geoghegan jo.geoghegan@crossways.org.uk
Emersons Green Primary School	Executive Headteacher: Simon Botten simon.botten@blackhorsepri.org.uk Head of School: Soraya Young soraya.young@egps.org.uk
Hanham Primary Federation	Headteacher: Gabby Howells Gabrielle.Howells@hanhamprimaryfederation.org
King's Forest Primary School	Headteacher: Helen Porter Helen.Porter@kingsforestschoool.co.uk
Mangotsfield CofE Primary School	Headteacher: Kristy Croasdale Kirsty.Croasdale@mangoschool.org
St. Barnabas CofE Primary School	Headteacher: Sarah Sheppard sarah.sheppard@stbarnabasprimaryschool.co.uk
Sea Mills Primary School	Headteacher: Andrew Kinnear andrew.kinnear@seamillsprimary.co.uk
Stanbridge Primary School	Head of School: Dave Payne david.payne@stanbridgeprimary.org.uk

Staple Hill Primary School	Headteacher: Sharon Boulton sharon.boulton@staplehillprimary.co.uk
The Tynings Primary School	Headteacher: Lois Haydon Lois.Haydon@thetynings.co.uk
Two Mile Hill Primary School	Headteacher: Owen Knowles OKnowles@twomilehillprimary.bristol.sch.uk
Wheatfield Primary School	Headteacher: Wendy Carver Wendy.Carver@wheatfieldprimary.com

Position Name Contact Details When to Use This Contact
CEO: Ross Newman Ross.Newman@leaftrust.co.uk <i>For concerns raised by members of the central team, or where it would not be appropriate to raise concerns at school level.</i>
Chair of Trustees: Margaret Simmons-Bird Contact via Clerk to Trustees: Clare.Blake@leaftrust.co.uk <i>For concerns raised where it would not be appropriate to raise concerns at school level or with the CEO.</i>

Appendix 2: Trade Union and whistleblowing prescribed external bodies

In most cases whistleblowing concerns should be dealt with via the internal procedure available. However, the law recognises that in some circumstances it may be appropriate for the individual to report his/her concerns to an external body such as a regulator. Individuals are strongly encouraged to seek advice, such as from their trade union representative, before reporting a concern externally outside of the Trust. The details below identify recognised trade union contacts and prescribed external persons and bodies to whom a whistleblowing disclosure can be made

External Body	Contact Details	Nature of Whistleblowing Concern
Recognised Trade Unions	ASCL https://www.ascl.org.uk/ GMB https://www.gmb.org.uk/ NAHT https://www.naht.org.uk/ NASUWT https://www.nasuwt.org.uk/ NEU https://neu.org.uk/ UNISON https://www.unison.org.uk/ UNITE https://www.unitetheunion.org/	Trade Unions will be able to offer their members advice and support in relation to whistleblowing concerns.
Prescribed external persons and bodies to whom staff can raise concerns	Whistleblowing: list of prescribed people and bodies - GOV.UK	Government guidance on whistleblowing provides a brief description about the matters you can report to each prescribed person.
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 E-mail: whistle@protect-advice.org.uk Website: https://protect-advice.org.uk	
NSPCC	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk	Safeguarding-related disclosures – see safeguarding policy.
Trust's external auditors (Bishop Fleming)	T: 0117 9100294 E: DButler@bishopfleming.co.uk	

Appendix 3: Whistleblowing – Raising a Concern Form

To be used when raising a concern under the Leaf Trust Whistleblowing Policy

If you wish to raise a concern under the Whistleblowing Policy, you are encouraged to use this form. It helps ensure the necessary information is captured to support appropriate and timely follow-up.

By completing this form, you confirm that you have a genuine concern that falls within the scope of the Leaf Trust Whistleblowing Policy.

Please note: While the Leaf Trust believes it can more effectively investigate your concern if you identify yourself, whether or not you choose to do so is entirely your decision. The Trust will consider and respond to all concerns raised. Where concerns are raised anonymously, the Trust will investigate the matter as far as is reasonably possible based on the information provided.

Part 1: To be completed by the employee raising the concern			
School (if applicable):			
Name and job title of person raising the concern		Date received	
Details of the concern being raised. What category does your disclosure relate to (please tick)?			
Criminal activity or offence(s)			☐
Failure to comply with a legal, including contractual, obligation			☐
Miscarriage(s) of justice			☐
Danger to health and safety			☐
Damage to the environment			☐
Bribery			☐
Financial fraud or mismanagement			☐
Risk to safeguarding			☐
Negligence			☐
Breach of internal policies and procedures including Code of conduct			☐
Conduct likely to damage our reputation or financial wellbeing			☐
Unethical behaviour			☐
Unauthorised disclosure of confidential information			☐
Discrimination and/or harassment (where part of a wider concern or breach of internal policy)			☐
Modern slavery (e.g. exploitation, human trafficking, forced labour). You may also contact the Modern Slavery Helpline on 0800 0121 700			☐
Deliberate concealment in any the above categories			☐
Any other substantial and relevant concern (please specify)			

Describe the concern in your own words:

(Include relevant dates, times, locations, names of persons involved, witnesses if known, and how long the issue has been a concern. Attach extra pages if needed.)

Why are you concerned about this issue?**Have you discussed this concern with any other person and/or organisation? (tick box)**Yes ☐ / No ☐**If yes, please provide details:**

Name:

Date:

Outcome:

DECLARATION: I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in disciplinary action against me.

Employee Signature**Date****Part 2: To be completed by the Trust representative (Headteacher / Trust leader)****Name and job title of person
receiving concern****Date received****Name and title of person
dealing with concern
(if different):****Date received (if different):**

Reference Number			
Initial action taken by the Headteacher/relevant person managing issue and outcome - ensuring any urgent action is undertaken:			
Concern resolved	Yes ☐ / No ☐	Date	
Is further action required?	Yes ☐ / No ☐	(If yes, specify the action and who will undertake it.)	
Has the employee been informed of the outcome/next steps?	Yes ☐ / No ☐	Date	
Has the concern been added to the whistleblowing log?	Yes ☐ / No ☐	Date	