



## ALTERNATIVE PROVISION

# Whistleblowing Policy

Approval Date: [January 2026](#)

Revision Due Date: [January 2027](#)

Approved by: [RAISE-AP Educational Directors](#)

Approval Signatures

*RAISE-AP  
Directors*

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## Aims

The [RAISE-AP](#) whistleblowing policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the trust
- Set clear procedures for how the trust will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services [RAISE AP](#) in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

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## Legislation and Definition

The requirement to have clear whistleblowing procedure in place is set out in the [Academies Financial Handbook](#) which forms a strong guide for alternative provisions to follow. This policy has been written in line with the above document, as well as [government guidance on whistle-blowing](#). [AISE AP](#) also take into account the [Public Interest Disclosure Act 1998](#).

Whistle-blowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistleblowing include (but aren’t limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staffs’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above. Not all concerns about [RAISE AP](#) count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures. The organization Protect (formerly Public Concern at Work) has:

1. [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
2. A free and confidential [advice line](#)

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## Raising a Whistleblowing Concern

### When to Raise a Concern

Staff should consider, when deciding whether their concern is of a whistleblowing nature, if the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

### Who to Report To

Staff should report their concern to the Head of Provision. If the concern is about the Head of Provision or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the [RAISE AP](#) education directors.

### How to Report the Concern

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. Staff need to be made aware of this policy and of how to contact both the Head of Provision and the [RAISE AP](#) education directors.

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# Whistleblowing Procedure

## Investigating the Concern

When a concern is received by the Head of Provision or the [RAISE AP](#) education directors – referred to from here as the ‘recipient’ – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, involving the Head of Provision or the [RAISE AP](#) education directors. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police
  - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

## Outcome of the Investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the Head of Provision or the [RAISE AP](#) education directors and other

staff if necessary will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst **RAISE AP** cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

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## **Malicious or Vexatious Allegations**

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, **RAISE AP** will consider whether any disciplinary action is appropriate against the person making the allegation.

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## **Escalating Concerns Beyond RAISE AP**

**RAISE AP** encourages staff to raise their concerns internally, in line with this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns can be found using the government whistleblowing list of prescribed people and bodies – [click here](#).

The Protect advice line can also help staff when deciding whether to raise the concern to an external party.

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## **Approval**

**RAISE AP** will review this policy yearly.

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## **Raise Values**

Our **RAISE-AP values** (Resolve, Attitude, Invest, Social Skills and Education) are key in everything we do, specifically with attitudes (modelling and expectations), invest (tailoring setup for our young people) social skills (becoming part of a community) which are linked to our Accessibility policy.

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