

WEST KIRBY EDUCATIONAL TRUST

A charity changing children's lives

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Whistleblowing Policy – also included in the EMPLOYEE HANDBOOK

2026-2027

Written by: Georgia Porter-Duffy (and A&P) **Date:** May 2026

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WHISTLEBLOWING POLICY

- 32.1. The Charity is committed to conducting its business 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 and to address them when they do occur.
- 32.2. The aims of this policy are:
- 32.2.1. 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;
 - 32.2.2. To provide staff with guidance as to how to raise those concerns; and
 - 32.2.3. To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 32.3. This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.
- 32.4. This policy does not form part of any employee's Contract of Employment and the Charity may amend it at any time.

What is Whistleblowing?

- 32.5. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- 32.5.1. criminal activity;
 - 32.5.2. failure to comply with any legal or professional obligation or regulatory requirement;
 - 32.5.3. miscarriages of justice;
 - 32.5.4. danger to health and safety;
 - 32.5.5. damage to the environment;
 - 32.5.6. bribery under the Anti-Corruption and Bribery Policy;
 - 32.5.7. financial fraud or mismanagement;
 - 32.5.8. negligence;

- 32.5.9. breach of the Charity's internal policies and procedures including the Code of Conduct;
 - 32.5.10. conduct likely to damage the Charity's reputation;
 - 32.5.11. unauthorised disclosure of confidential information; and
 - 32.5.12. the deliberate concealment of any of the above matters.
- 32.6. A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Charity's activities (a "whistleblowing concern") you should report it under this policy.
- 32.7. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Policy or Anti-Harassment and Bullying Policy as appropriate.
- 32.8. If you are uncertain whether something is within the scope of this policy you should seek advice from the Head Teacher.

Raising a Whistleblowing Concern

- 32.9. The Charity hopes that in many cases you will be able to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.
- 32.10. However, where the matter is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:
- 32.10.1. Richard Hicks, Headteacher (West Kirby School & College) CH48 5DH, 0151 632 3201, rhicks@wkrs.co.uk;
 - 32.10.2. Liz Wynne, Headteacher (Acre View Primary School) CH48 5DH, 0151 632 3201, ewynne@acre-view.co.uk;
 - 32.10.3. Sian Thomas, CEO, CH48 5DH, 0151 632 3201, sthamas@wkrs.co.uk;
 - 32.10.4. Julie Merry, Chair of the Trust Board, CH48 5DH, 0151 632 3201, jmerry@wkrs.co.uk;
 - 32.10.5. Protect (formerly Public Concern at Work) Independent Charity, The Green house, 244-254 Cambridge Heath Road, London E2 9DA, whistle@protect-advice.org.uk, <https://protect-advice.org.uk/>.

- 32.11. The Charity 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.
- 32.12. The Charity will take down a written summary of your concern and provide you with a copy after the meeting. The Charity will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

- 32.13. The Charity hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, the Charity will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, the Charity will discuss this with you.
- 32.14. The Charity does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Charity 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 the Whistleblowing Officer or one of the other contact points listed above and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from the confidential counselling hotline or Protect, the independent whistleblowing charity, who offer a confidential helpline.

Investigation and Outcome

- 32.15. Once you have raised a concern, the Charity will carry out an initial assessment to determine the scope of any investigation. The Charity will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 32.16. In some cases the Charity 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 Charity to minimise the risk of future wrongdoing.
- 32.17. The Charity will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Charity giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

32.18. If the Charity concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

If You Are Not Satisfied

32.19. While the Charity cannot always guarantee the outcome you are seeking, the Charity will try to deal with your concern fairly and in an appropriate way. By using this policy you can help the Charity to achieve this.

32.20. 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 above. Alternatively you may contact the chairman of the board of directors or the Charity's external auditors.

External Disclosures

32.21. 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.

32.22. 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. The Charity strongly encourages you 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.

32.23. Whistleblowing concerns usually relate to the conduct of the Charity's 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 you if you raise the matter with the third party directly. However, the Charity encourages you to report such concerns internally first. You should contact your manager or one of the other individuals set out above for guidance.

Protection and Support for Whistleblowers

32.24. It is understandable that whistleblowers are sometimes worried about possible repercussions. The Charity aims to encourage openness and will support staffs that raise genuine concerns under this policy, even if they turn out to be mistaken.

32.25. Whistleblowers must not suffer any detrimental treatment as a result of raising a 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 the Headteacher immediately. If the matter is not remedied you should raise it formally using the Grievance Policy.

32.26. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.