



Vanguard Learning Trust

As a group of local primary and secondary schools, Vanguard Learning Trust's mission is to serve its local community by providing outstanding, inclusive education. We have a collective purpose and responsibility to provide effective teaching, through a curriculum based on equality of opportunity and entitlement that allows our students to shine both in and out of the classroom. Each school in the Trust has its own ethos, which also complements the Trust's vision and values, and the common aspiration that all students can achieve their potential.

Whistleblowing policy

July 2026

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Section 1: Introduction

1.1 Culture of openness and accountability

The board of trustees is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards in accordance with schools' and/or the Trust's codes of conduct. 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 Legislation

This policy is based on the Public Interest Disclosure Act 1998.

1.3 Non-contractual policy

This policy does not form part of any employee's contract of employment or other contract to provide services and the Trust may amend it at any time.

Section 2: Scope and purpose

2.1 Aims

The aims of this policy are 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;
- provide staff with guidance on how to raise concerns; and
- reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2.2 Application

This policy applies to all employees of Vanguard Learning Trust as well as governors, members, trustees, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

2.3 Consultation and review

This policy is reviewed in line with the Trust's policy review cycle by the Trust in consultation with staff and recognised trade unions. The Director of People, who is the designated whistleblowing officer, and HR development director will monitor the application and outcomes of this policy to ensure it is working effectively and complies with legal standards.

Section 3: What is whistleblowing?

3.1 Definition of whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are dangers or wrongdoing at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements

- bribery
- financial fraud or mismanagement
- negligence
- breach of internal policies and procedures including the staff code of conduct
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- unethical behaviour
- the deliberate concealment of any of the above matters
- sexual harassment

This list is neither definitive nor exhaustive.

3.2 Whistleblower

A whistleblower is a person who raises a genuine concern relating to a qualifying disclosure as stated in Section 3.1. Should an individual have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), they should report as outlined in this policy. This policy should not be used for complaints relating to an individual's personal circumstances, such as the way you have been treated at work. In those cases, staff should use the Trust's grievance procedure.

3.3 Wider concerns

If a complaint relates to an individual's personal circumstances but they also have wider concerns regarding one of the areas set out in Section 3.1, they should discuss it with the Trust's director of people (who is the designated whistleblowing officer) for advice on how best to proceed. The director of people can also provide advice if an individual is uncertain whether something is within the scope of this policy.

3.4 Safeguarding

If a concern is in relation to safeguarding and the welfare of students, individuals should consider whether the matter is better raised under the school's safeguarding policy and in accordance with the arrangements for reporting such concerns, eg. via the designated safeguarding lead, although the principles set out in the policy may still apply.

Section 4: Raising a whistleblowing concern

4.1 Raising a concern

Individuals can raise any concerns with their line manager or point of contact for those who are not employees. This can be done in person or by putting the matter in writing. They may be able to agree on a way of resolving the concern quickly and effectively.

4.2 Named individuals

The Trust's designated whistleblowing officer is Stephen Burns, the Trust's Director of People, and the named trustee is David Trood, the Trust's HR-lead and Chair of the Pay and Personnel Committee. This is outlined in **Appendix 1a**. The designated whistleblowing officer is the central point of contact for any whistleblowing-related advice and queries. They are also responsible for maintaining the logs associated with any whistleblowing concerns.

4.3 Escalation

Where the matter is more serious, or the individual feels that their line manager has not addressed the concern, or they would prefer not to raise it with them for any reason, or they are the subject of the complaint, then the following should be followed:

- Each school's headteacher should be contacted for school-level concerns;
- Each school's chair of governors should be contacted if the concern relates to the headteacher;

- The chief executive officer should be contacted if the concern relates to any member of the central team;
- The Trust's chair of trustees should be contacted if the concern relates to the chief executive officer; and
- The governance professional should be contacted if the concern relates to governors, members or trustees.

In cases that warrant a full investigation (see Section 7.2), the above persons will become the 'commissioning officer'. Contact details are set out in **Appendix 1b**.

4.3 Meeting

An initial meeting will be arranged as soon as possible to discuss the concerns. The individual raising the concern 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.

4.4 Written summary of concerns

A written summary of the concern will be provided to the individual after the meeting and sent for accuracy checking. An indication will also be given of next steps in terms of how the matter will be dealt with.

Section 5: Confidentiality and data protection

5.1 Confidentiality

It is hoped that individuals will feel able to voice whistleblowing concerns openly under this policy. However, if an individual wants to raise a concern confidentially, every effort will be made to not name the person. If it is necessary for anyone investigating the concern to know the identity of the whistleblower, this will be discussed before information is shared.

5.2 Anonymous disclosures

Individuals are encouraged not to make disclosures anonymously. Proper investigation may be more difficult or impossible if further information cannot be obtained. 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 Section 4.2 and appropriate measures can then be taken to preserve confidentiality. Should an individual require independent advice, they are encouraged to contact Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are given in **Appendix 1c** as well as the NSPCC's whistleblowing helpline. Where an anonymous complaint is received, the complaint will be investigated as far as is reasonable taking into account:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources.

5.3 Data retention

As part of the application of this policy, the Trust may collect, process and store personal data in accordance with the Trust's data protection and retention policy. The Trust complies 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 the policy and in line with the requirements of Data Protection Legislation.

Section 6: External disclosures

6.1 Legal framework

As noted in Section 2, the aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases individuals should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate to report concerns to an external body such as a regulator and therefore the Department for Education and Ofqual are outlined in **Appendix 1c**. It will very rarely, if ever, be appropriate to alert the media. Individuals are encouraged to seek advice before reporting a concern to anyone external. Protect holds a list of prescribed regulators for reporting certain types of concern as well as the Department for Business, Energy & Industrial Strategy.

6.2 Raising concerns with a third party

Whistleblowing concerns usually relate to the conduct of the Trust's 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 the individual who raises a concern with the third party directly where they reasonably believe it relates mainly to the organisation's actions and/or something that is legally their responsibility. The Trust, however, encourages individuals to report such concerns internally first as outlined in Section 4.

Section 7: Investigation and outcome

7.1 Initial response

Once a concern has been raised, the designated person as detailed in Section 4.2 will commission an initial assessment in order to determine the scope of any investigation. The individual raising the concern will be informed of the outcome of the assessment, including whether they are required to attend additional meetings in order to provide further information. During any discussions or investigation, it may become apparent that other people should be consulted, eg. legal advisers etc.

7.2 Investigation

In some cases, an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter, will be appointed by the designated person as detailed in Section 4.2. In some circumstances, this may involve the appointment of an external person or body to investigate the concern. With due regard for the nature of the concern, should it be that a significant investigation is commissioned, it should begin after a holiday wherever possible eg. summer break. The investigator(s) will collate findings on the matter for the consideration of the commissioning officer. The investigating officer may make recommendations for change to enable the school/ Trust to minimise the risk of future wrongdoing if there has been a case to answer. This will be sent to the commissioning officer and they will share a copy with the chief executive officer who will provide advice on any recommended action to be taken. In all cases, the commissioning officer's decisions will be added to the whistleblowing log.

7.3 Action taken

The action taken following an investigation will be proportionate and will depend on the nature of the concern. It may lead to disciplinary action; a referral to the police or other regulatory authority; and/or the subject of an independent inquiry.

7.4 Communication and confidentiality of information

The aim will be to keep the individual raising the concern informed of the progress of the investigation and its likely timescale.. However, sometimes the need for confidentiality may prevent specific details of the investigation being shared, in particular if the outcome relates to any disciplinary action taken as a result of the findings. The individual must treat any information about the investigation as confidential.

7.5 Dissatisfaction with outcome

If an individual is not satisfied with the way in which their concerns have been handled, they can raise it with one of the other key contacts in paragraph 4.2. Alternatively, they may contact the Trust's external auditors, a list of whom is set out in **Appendix 1c**. In exceptional circumstances, eg. a criminal matter, the individual may contact the police.

7.6 Media, including social

Concerns or dissatisfaction should not be taken to the media. The individual should use the internal and external escalation as outlined in Sections 4.3 and 7.5. Any information shared orally or in writing with the media, including social ones, will, in most cases, constitute a breach of the Trust's code of conduct and will lead to disciplinary investigation.

7.6 Malicious allegations

In the case that the investigation's conclusion is that the whistleblower has made false allegations maliciously, they will be subject to disciplinary action.

Section 8: Protection and support for whistleblowers

8.1 Protection

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

8.2 Raising a grievance

If a member of staff believes that they have suffered any detrimental treatment as noted in Section 8.1, they should inform one of the contact people in Section 4.2 immediately. If the matter is not remedied they should raise it formally using the Trust's grievance procedure.

8.3 Support and advice

There are a number of organisations available to whistleblowers who raise concerns under this policy. Their contact details are set out in **Appendix 1c**. Individuals can also seek advice from a relevant professional body including trade union and professional associations.

Revision date	By	Summary of changes made
July 2026	BoT	- Section 2.3: clarifies the director of people is the designated whistleblowing officer (also section 3.1), update to the title for the HR development director. - Section 3.1: renames the staff code of conduct.

		- Section 4.2: additional explanation of the designated whistleblowing officer role. - Section 4.3: the chief executive officer is to be contacted for any concerns relating to the central team. Also states that the named persons will become the 'commissioning officer' should any formal investigation be commissioned. - Section 7.1: after an initial concern, the designated person in Section 4.2 will commission an initial assessment. - Section 7.2: any formal investigation will be commissioned by the designated person in Section 4.2. Any longer investigation will begin after a school break depending on the nature of the concern. Also states that the commissioning officer will receive a copy of the report and any recommendations and that copy will be shared with the chief executive officer who will provide advice on any recommended actions. The whistleblowing log will include the decisions that have been taken by the commissioning officer. - Appendix 1b: updated to name of the designated safeguarding lead for Ryefield Primary School.
April 2026	F&R	sexual harassment has been added to the list of 'qualifying disclosures'.
October 2025	N/A	Appendix 1a updated with Trust personnel. Policy unchanged
February 2024	BoT	New policy based on model template from Browne Jacobson
July 2021	BoT	Date of new review
July 2018	BoT	Removed from Finance Policy to create stand alone policy. Company name changed. Safeguarding section checked. Flowchart added
July 2017	BoT	Policy reviewed, no changes made
March 2015	BoT	Changes made to reflect new MAT status, Branding changed.

Appendix 1a: Named officer and trustee

Named officer/trustee	Contact details
Whistleblowing Officer	Stephen Burns sburns@vlt.org.uk
Trustee	David Trood vltgovernance@vlt.org.uk

Appendix 1b: Points of contact for raising concerns

Field End Junior School: enquiries@fieldendjuniors.org.uk

Role	Staff
Headteacher	Jacqueline Phelan
Chair of Local Governing Body	Carolyn Morrissey
Designated Safeguarding Lead	Catherine Tobin

Hermitage Primary School: office@hermitageprimary.org.uk

Role	Staff
Headteacher	Nicholas Hingley
Co-Chair of Local Governing Body	Kirsty Farrell

Designated Safeguarding Lead	Parmjit Varaitch
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Ruislip High School: office@ruisliphigh.org.uk

Role	Staff
Headteacher	Gareth Davies
Chair of Local Governing Body	John Garner
Designated Safeguarding Lead	Marie Coltman

Ryefield Primary School: ryefield.enquiries@ryefieldprimary.org.uk

Role	Staff
Headteacher	Colin Tucker
Chair of Local Governing Body	Kirsty Farrell
Designated Safeguarding Lead	Clare Hayward

Vyners School: office@vynersschool.org.uk

Role	Staff
Headteacher	Gary Mullings
Chair of Local Governing Body	Claire Clarke
Designated Safeguarding Lead	Emma Bashford-Hynes

Vanguard Learning Trust: vltgovernance@vlt.org.uk

Role	Staff
Safeguarding lead	Adam Walthaus
Trustee	David Trood

Appendix 1c: External agencies

Organisation	Contact details
ACS Health Assured employee programme	Link to information: click here
Education Support helpline	Helpline: 0800 562 561 Website: click here
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: click here
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 Website: click here
Ofqual	Telephone: 0300 303 3344 Website: click here
Department for Business, Energy & Industrial Strategy	Website: click here
Kreston Reeves	Email: academywhistleblowing@krestonreeves.com Website: click here
Public Concern at Work	Telephone: 0207 404 6609 Email: whistle@pcaw.co.uk Website: click here