The Societas Trust

Confidential Reporting
(Whistleblowing) Procedure

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Reviewed and Agreed by	The Directors' Board
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Next Review Date	Autumn 2026

1.0 Introduction

The Societas Trust (The Trust) is proud of the high standards it operates and is dedicated to providing a quality service to pupils, parents, governors and its academies. The Trust promotes good educational practices and is committed to addressing poor practices.

Individuals who work at or for the Trust, either centrally or at any of its academies, are often the first people to realise that there may be something seriously wrong.

You have a right and a responsibility to raise concerns about poor practices and a right to be protected from reprisals if you do raise concerns in accordance with this procedure. Any colleague becoming aware of inappropriate activity are encouraged to report it without delay.

The Trust recognises that colleagues may wish to seek advice and be accompanied by either a work colleague or their Trade Union when using the provisions of this procedure and acknowledges and endorses the role representatives play in this process.

The procedure has been consulted on with recognised Teaching and Support Trade Unions and its operation will be kept under review.

2.0 What is this Procedure For?

The Confidential Reporting (Whistleblowing) Procedure covers concerns identified in Section 8 below which fall outside the scope of other Trust / Academy procedures e.g. grievance policy. It also provides a channel for you to report concerns and ensures that the Trust, and / or any of its academies, provides you with appropriate support.

3.0 Who Can Use this Procedure?

This procedure can be used by:

- an employee* (e.g. permanent, temporary, casual or student on placement)
- a volunteer*
- a contractor*
- a worker* (e.g. an agency worker provided via a contract for service with an employment agency or similar).

At any of the establishments governed by The Societas Trust.

** Referred to as colleagues throughout the procedure.*

4.0 Principles of the Confidential Reporting (Whistleblowing) Procedure

This procedure explains how you can raise concerns and what the Trust / Academy will do to deal with these concerns and to support you.

The procedure is based on several principles:

- Our primary duty of care to children and young people and other users of our services;

- Concerns raised internally will be taken seriously and investigated;

- Those raising concerns under this procedure will be offered support and will be protected from detriment;

- The Trust / Academy will not tolerate any harassment, bullying or detriment to colleagues raising honest and reasonable concerns;

- Where reckless or malicious allegations are made, this may lead to disciplinary action up to and including dismissal.

5.0 Raising a Serious Concern

Whistleblowing is a term commonly used for raising serious concerns. This procedure aims to encourage and enable colleagues to raise their concerns within the Trust / Academy rather than overlooking the problem or raising them externally.

Any problem should be resolved as close to its source as possible. It is better, therefore, to report concerns, in the first instance, to your line manager, the senior leadership team or the Head Teacher. If you prefer to talk with someone outside your direct management you can raise your concerns with the Chair of the Governing Board of the Academy. If your concerns relate directly to the Head Teacher and / or any member of the Academy's Local Governing Board, then you should report it to the CEO of The Societas Trust – ceo@societastrust.org.uk
If your concerns relate to the CEO or a member of the Trust Board, then you should either report them to the chair of the Trust Board (chair@societastrust.org.uk), or the Trust's external auditor (as appropriate).

When reporting your concerns, you must state you are raising an issue under the Confidential Reporting (Whistleblowing) Procedure and specify whether you wish your identity to be kept confidential.

The person to whom your disclosure is made may ask you to formalise your concerns in writing either before or after the first meeting if you have not already done so. Your formal written disclosure will be acknowledged and the person dealing with it will keep a record of further action taken.

6.0 Confidentiality

The Trust / Academy will maintain confidentiality as far as is reasonably practicable. Colleagues are also required, as are their work colleague or trade union representative, to maintain the highest level of confidentiality regarding the concerns raised.

7.0 Support Available

The Trust / Academy appreciates that individuals who raise concerns may feel anxious. The person receiving the information is responsible for ensuring colleagues receive the appropriate support and will talk to you regarding what support you feel is necessary and reasonable. This may include but is not restricted to support from your trade union, occupational health or a buddy from the Trust.

Colleagues should feel confident that their concerns will be treated seriously and sensitively.

The process of investigating concerns can be lengthy. The colleague will be kept informed of developments and will be supported throughout. Colleagues who have genuine concerns should not be put off either raising them in the first place or seeing them through the investigation process because of a lack of support.

Colleagues who raise serious concerns under this procedure should not be subjected to any detriment as a result of their disclosure. Detriment includes unwarranted disciplinary action, victimisation or threats. If the individual believes they have been subjected to a detriment as a result of raising concerns under this procedure they should raise a grievance in accordance with that policy and procedure, which may result in dismissal of the individual(s) concerned and or potential personal liabilities.

8.0 What Disclosures are Protected under this Procedure?

The law protects colleagues who raise concerns under this procedure (via the Public Interest Disclosure Act 1998). To rely on this legal protection, you should have a reasonable suspicion that the disclosure is in the public interest and:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
- that a miscarriage of justice has occurred is occurring or is likely to occur;
- that the health and safety of any individual has been, is being or likely to be endangered;
- that the environment has been, is being or is likely to be damaged, or;
- that information tending to show any matter falling within any one of the preceding paragraphs has been, or is likely to be deliberately concealed.

New rights under Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025 extended employment law protections to individuals reporting suspected sanctions breaches for financial, trade, and transport sanctions

9.0 How are Concerns Dealt With?

In the first place the person whom you made the disclosure to needs to make sure that no one is at serious risk or in danger. If they are, prompt action needs to be taken to protect them.

Initial Fact Finding

Initial enquiries will usually be made to decide how to deal with any concerns raised. All concerns will be investigated in-line with the Trust's Investigation Procedure.

Investigations

Investigations might be undertaken by the Head Teacher, a member of the senior leadership team or an Academy governor. If the concerns raised are in connection with the Head Teacher and / or members of the Local Governing Board of the Academy, then the investigation will be undertaken by an investigating manager appointed by the CEO / Trust Board.

You are entitled to be accompanied by a workplace colleague or union representative at any meeting in relation to your disclosure, but not by a family member.

Timeframes (Please also refer to the Investigation Procedure)

The Trust / Academy will endeavour to have an initial meeting with the colleague to discuss their concerns within 5 working days of the concerns being raised.

The Trust / Academy will then endeavor to ensure all initial 'fact finding' investigations are completed within 10 working days. However, more complex investigations may take longer. Any investigation taking longer than 28 working days will be reviewed and you will be updated on expected revised timescales.

Colleagues should be aware that where concerns are raised at the end of a term that the inevitable delay will apply whilst the school is closed for the holiday.

The investigating manager will provide feedback to the deciding manager once the concerns raised have been investigated; and, as far as is practicable, or as confidentiality rules allow, the deciding manager will inform you of the outcome of the investigations and of any recommendations / proposed actions.

If you have any concerns at any time, either during the investigation or upon its conclusion, then you should report them either to the investigating officer or to the deciding manager. If you do not feel able to speak to either of these people, then you should speak directly to the CEO – ceo@societastrust.org.uk If your concerns relate to the CEO or a member of the Trust Board, then you should either report them to the chair of the Trust Board (chair@societastrust.org.uk), or the Trust's external auditor (as appropriate).

Record Keeping

The Trust / academy will keep its own record of all concerns raised under this procedure in a secure environment.

10.0 Anonymous Reporting

The Trust / Academy will do as much as is reasonably possible to preserve the anonymity of anyone reporting their concerns if requested and as far a reasonably possible. Although it should be noted that that there may be times when anonymity cannot be maintained e.g. due to the nature of the concerns being raised or should legal proceedings require disclosure.

11.0 What Happens If the Concerns Are Not Founded?

If the colleague has acted in good faith they will not be penalised in any way and the Trust / Academy will do what it can to support the colleague

Where it is found that, reckless or malicious allegations have been made, the Trust / Academy may consider addressing the matter using the disciplinary policy and procedure up to and including dismissal.

12.0 How to Take the Matter Further?

Where there is a reasonable belief by the colleague that appropriate action has not been taken in relation to their concern, they may raise the matter externally to a prescribed regulator, or the Trust's external auditor (Tim McNeal, Hardings Chartered Accountants – 01782 617868).

To receive the protection of the law an 'external disclosure' (that is a serious concern raised outside the Trust / Academy), must fit into one or more of the categories listed in section 8.0 and you must:

- Make the disclosure in the reasonable belief that the disclosure is in the public interest;
- Reasonably believe that the information disclosed, and any allegation contained in it, are true;
- Ensure the disclosure is not for personal gain;
- Ensure that in all circumstances of the case it is reasonable to make the disclosure.

The charity 'Public Concern at Work' can advise colleagues on making an external disclosure - 020 7404 6609, or by email at whistle@pcaw.org.uk. For further information please see their website at www.pcaw.co.uk