



# Whistleblowing Policy

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| <b>Approval Body:</b>       | Audit and Risk Committee |
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| <b>Review Date:</b>         | November 2026            |
| <b>Policy Version:</b>      | 7                        |

| <b>Version</b> | <b>Reviewed</b> | <b>Changes since last version</b>   |
|----------------|-----------------|---|
| 1              | June 2017       | <ul style="list-style-type: none"> <li>• New policy</li> </ul>  |
| 2              | November 2018   | <ul style="list-style-type: none"> <li>• No changes – part of the annual review</li> </ul>  |
| 3              | November 2019   | <ul style="list-style-type: none"> <li>• No changes – part of the annual review</li> </ul>  |
| 4              | November 2020   | <ul style="list-style-type: none"> <li>• No changes – part of the annual review</li> </ul>  |
| 5              | November 2021   | <ul style="list-style-type: none"> <li>• Reference to Academy Trust Handbook 2021.</li> <li>• New contact email address</li> </ul>              |
| 6              | November 2022   | <ul style="list-style-type: none"> <li>• Reference to Academy Trust Handbook 2022.</li> </ul>   |
| 7              | November 2023   | <ul style="list-style-type: none"> <li>• Names of Chairs of Committees updated.</li> </ul>  |
| 8              | November 2024   | <ul style="list-style-type: none"> <li>• Reference to Academy Trust Handbook 2024</li> <li>• Formatting (inserted paragraph numbers)</li> </ul> |
| 9              | November 2025   | <ul style="list-style-type: none"> <li>• Reference to Academy Trust Handbook 2025</li> </ul>  |

**This policy has been adopted by the Mulberry Schools Trust and will be applied to all schools which belong to the Mulberry Schools Trust.**

## **1.0 Introduction**

- 1.1 The staff and trustees of Mulberry Schools Trust seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of the school staff, parents, governors or the school community at large become aware of activities which give cause for concern, Mulberry Schools Trust has established the following whistleblowing policy, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.
- 1.2 Throughout this policy, the term whistleblower denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and it is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies published in May 1996.
- 1.3 The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook 2025, published by the Education and Skills Funding Agency. This policy has been written in line with the above document, as well as government guidance on whistle-blowing. We also take into account the Public Interest Disclosure Act 1998 (<https://www.legislation.gov.uk/ukpga/1998/23/contents>)
- 1.4 Mulberry Schools Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Mulberry Schools Trust recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management of the school.
- 1.5 Mulberry Schools Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately resolved.

- 1.6 The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance that would be dealt with under the Mulberry Schools Trust grievance procedures.

## **2. When might the whistleblowing policy apply?**

- 2.1 The type of activity or behaviour which Mulberry Schools Trust considers should be dealt with under this policy includes:

- Manipulation of accounting records and finances
- Inappropriate use of school assets or funds
- Decision making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Danger to an individual's health & safety
- Serious breaches of school procedures which may advantage a particular party (for example – tampering with tender documentation, failing to register a business interest)

## **3. What action should the whistleblower take?**

- 3.1 Mulberry Schools Trust encourages the whistleblower to raise the matter internally in the first instance to allow those school staff and trustees in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour of activity.

- 3.2 Mulberry Schools Trust has designated three individuals to specifically deal with such matters and the whistleblower is invited to decide which of the individuals would be the most appropriate person to contact from the list below:

The Chair of Mulberry Schools Trust – Ms Jane Farrell  
The Chair of the Finance Committee – Mr David Gracie  
The Chair of the Audit and Risk Committee – Ms Alice Crawley  
The Chief Executive Officer – Dr Vanessa Ogden

- 3.3 An email can also be sent to [whistleblowing@mulberryschoolstrust.org](mailto:whistleblowing@mulberryschoolstrust.org). This email will be routed directly to the Chair of Mulberry Schools Trust and the Chair of the Finance Committee.

- 3.4 The whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.
- 3.5 Whistleblowing to an external body without using the internal procedures is inadvisable without compelling reasons. However, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter can be directed to the Department for Education (DfE). The DfE's online complaint form allows for whistleblowing (disclosure in the public interest). Typing in 'Contact the Department for Education' into any online search engine provides the link to this form.
- 3.6 In addition, information and advice can be obtained from the charity 'Protect' <https://protect-advice.org.uk/> (formerly called Public Concern at Work). This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation.

#### **4 How will the matter be progressed?**

- 4.1 The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, e.g. Involvement of other members of staff, legal or personnel advisors, the police, the Department for Education or the local authority. Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the trustees, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral, such as the police. If there is a need to appoint an independent auditor as the investigating officer(s) this will also be considered.
- 4.2 The whistleblower will be informed of the results of the investigation and the action to be taken to address the matter. Depending on the nature of the concern and whether or not it has been substantiated, the matter will be reported to the trustees and any necessary external parties.

- 4.3 If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been

handled appropriately, the concerns should be raised with the investigating officer(s), the trustees and/or directed to the Department for Education.

## **5. Respecting confidentiality**

5.1 Wherever possible Mulberry Schools Trust seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect them from reprisals. Mulberry Schools Trust will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

## **6. Raising unfounded malicious concerns**

6.1 Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

## **7. Conclusion**

7.1 Good practice within Mulberry Schools Trust in terms of its systems of internal control (both financial and non-financial) and the external regulatory environment in which the trust operates ensures that cases of suspected fraud or impropriety rarely occur. This whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the trust. This document is a public commitment that concerns are taken seriously and will be actioned.