NEWMAN CATHOLIC TRUST

HEART SPEAKS TO HEART

Whistleblowing Policy

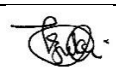
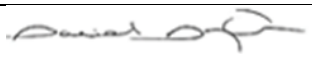
2026-27

Category 1 Policy

Review

Review Cycle	Date of Policy	Reviewed by	Review Date
Annual	Jan 26	Board	Jan 27

Ratification

Role	Name	Signature	Date
Chair	**Chris Izuka**		**Updated September 2026**
CEO	**Dr Daniel Doyle**		**Updated September 2026**

Commitment to Equality:

The Trust and its schools are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in

relation to human dignity and dignity in work become embedded in every aspect of school life, and these policies are reviewed regularly in this regard.

"Rooted in faith, we ignite a love of learning, foster inclusive education and empower every individual to achieve their utmost potential."

Amendment History

Version	Amendment Date	Author	Amendment Summary
1	September 2026	Dr D. Doyle	Updated September 2026 to reflect current statutory and DfE guidance, strengthen whistleblowing reporting and investigation procedures, clarify protections for those raising concerns, update external reporting and safeguarding routes, and refresh Trust/school contacts.
2			

Any amendments to policies to be highlighted in green. Once approved the highlighting to be removed for any policies published on websites.

1. Introduction

The Cardinal Newman Catholic Educational Trust (Newman Catholic Trust/Trust/MAT) is founded by and forms part of the Catholic Church. In addition to the Church's funds which established the Trust's schools, it is sustained in its mission by receipt of public monies. Accordingly, it is accountable to the Catholic community of which it is a part, and which provided the schools, and also to the public whose funds it expends.

The Newman Catholic Trust, as an employer, is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect members of the public, employees and others who working at the company, who have serious concerns about any aspect of the work of any employee, a worker for the Trust (including Seconded employees) or a member of the public to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

Newman Catholic Trust is dedicated to providing the utmost care for its pupils and staff. We aim to ensure all members of the Trust community feel safe in the knowledge that they can voice concerns in confidence, that they will be taken seriously and dealt with appropriately.

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult position. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of

the child is paramount. This policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Newman Catholic Trust takes responsibility for ensuring that all staff are aware of whistleblowing policy and procedures and made to feel comfortable that they can voice their concerns no matter what the circumstances.

The Trust is committed to fostering a culture in which every employee feels psychologically safe to raise concerns. Speaking up is viewed as a professional responsibility and an essential component of strong safeguarding and governance.

2. Legal framework

This policy has due regard to all relevant legislation and guidance, including but not limited to:

- Public Interest Disclosure Act
- Employment Rights Act
- Equality Act
- Academy Trust Handbook
- Academy Trust Governance Guide
- Keeping Children Safe in Education
- DfE guidance: *Blowing the whistle to the Department for Education*
- GOV.UK guidance: *Whistleblowing for employees*
- ACAS guidance on whistleblowing at work
- current GOV.UK list of prescribed persons and bodies

This policy operates in conjunction with the following Trust policies:

- Disciplinary Policy and Procedure
- Complaints Procedures Policy
- Data Protection Policy
- Safeguarding and Child Protection Policy

3. Definition of 'whistleblowing'

Whistleblowing inside the workplace is defined as the reporting by workers or ex-workers of wrongdoing, such as fraud, malpractice, mismanagement, breach of health and safety law, or any other illegal or unethical act either on the part of management, the governing body or fellow employees. Workers may include volunteers, contractors and outside agencies or others.

The Public Interest Disclosure Act 1998 (known as the 'Whistleblowers Act') protects employees against any detrimental treatment or dismissal if, in the interest of the public, they disclose to their employer matters concerning the conduct of Newman Catholic Trust and its personnel that would normally be regarded as confidential.

It does not apply to any grievance that an employee may have about his/her own employment for which Newman Catholic Trust have already established statutory procedures to enable them to seek redress under the provisions of the School Staffing (England) Regulations 2003, Regulation 6(1)(b)1.

4. Definitions

Whistleblowing is when an employee reports suspected wrongdoing, or 'qualifying disclosures', at work to their employer.

As outlined by the PIDA, qualifying disclosures pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject

- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- Sexual harassment has occurred, is occurring or is likely to occur
- The environment has been, is being or is likely to be damaged
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed

A disclosure about sexual harassment may amount to a protected disclosure where the worker reasonably believes that the disclosure is in the public interest.

In the public interests means that an individual acted outside of their own personal interest – they acted for more than personal gain. It is not necessary for the disclosure to be of interest to the entire public. The following considerations are often used as a test to establish whether something is within the scope of public interest:

- The number of people in the group whose interests the disclosure served
- The nature of the interests and the extent by which individuals are affected by the wrongdoing disclosed
- The nature of the wrongdoing disclosed
- The identity of the alleged wrongdoer

Blacklisting refers to an individual who is being refused work because they are viewed as a whistleblower.

Grievances involve someone filing a complaint because they personally have been mistreated in some way – the person making the complaint will have a direct interest in the outcome. It is important to understand the difference between raising a grievance and blowing the whistle.

5. Reporting concerns to the Trust or one of its schools

Individuals are encouraged to raise concerns at the earliest opportunity. In most cases, concerns should be reported using the following escalation pathway:

• Line manager or Designated Safeguarding Lead (where relevant)
• Principal, Head of School or Senior Leader
• Chief Executive Officer
• Chair of the Local Governing Committee or Chair of the Board (or the Trust's Lead Governance Professional acting on their behalf)
• External prescribed body where internal routes are not appropriate

Individuals may bypass any stage of this pathway if they feel unable to use a particular reporting route.

If your concern relates to a Trust school and a member of school staff, you should report it to a member of the school leadership team, the designated person for safeguarding, your line manager or the Senior School Leader (e.g. the Executive Principal, Principal, Head of School). Complaints about the Senior School Leader should be reported to the Chair of the Local Governing Committee.

If your concern relates to a member of the Trust Central Team, you should report it to the CEO. If your concern relates to the CEO, you should report your concern to the Chair of the Board.

Concerns may be raised verbally or in writing. Where a concern is raised verbally, the person receiving the concern will make a written record and agree the accuracy of the record with the individual raising

the concern wherever reasonably practicable. Concerns raised must include the following information as far as possible:

- The background and history of the concern
- Any relevant names, dates and places
- The reasons for the concern

Anonymous disclosures will be considered. However, individuals are encouraged to provide their identity where possible so that concerns can be investigated fully and appropriate feedback provided.

All concerns will be listened to and taken seriously. If you are in any doubt as to whether a concern is valid, you should report it, and the school or Trust can decide to what extent it needs to be investigated. Individuals who would like to seek professional and confidential advice should contact Protect, a registered charity that advises on whistleblowing queries. The Protect website can be accessed here (www.protect-advice.org.uk), or they can be contacted on 020 31172520.

Once an individual has raised a concern, the appropriate receiving body will be responsible for investigating it.

In certain instances, it may be appropriate for the individual to raise the concern with an outside agency, e.g. the police, depending on the severity of the concern. Equally, it may be appropriate for the individual to request that their trade union raises the matter.

If a member of staff feels they should report a concern to the ESFA, they should use the online contact form.

Appropriate whistleblowing procedures will be put in place for concerns about poor or unsafe practice and potential failures in safeguarding systems will to be raised with the SLT of the school in question or directly with the Trust.

If a member of staff feels like they are unable to raise a safeguarding-related concern with the school or Trust or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the appropriate LADO of the school's Local Authority.

In accordance with the Academy Trust Handbook, the Trust will identify at least one trustee and one member of staff as named contacts for whistleblowing concerns. These contacts will be published to staff and kept under review.

These contacts are:
Chair of the Board: Chris Izuka
CEO: Dr Daniel Doyle

The Trust will acknowledge receipt of a disclosure where contact details have been provided and will maintain appropriate communication with the person raising the concern, subject to confidentiality, safeguarding, legal and employment considerations. Where a concern is referred to an external body, that body may determine its own process for communication and investigation.

6. Interview and investigation

The individual receiving and overseeing the concern will write to the person raising the concern within **10 working days** of the initial meeting to confirm that the concern has been received and to indicate

proposals for dealing with the matter. Investigations will be conducted as promptly as possible, and indicative timescales will be communicated to the person raising the concern where appropriate.

Concerns will usually be dealt with in this way:

- Staff will normally raise their concern with their line manager, either in person or in writing. If their line manager is the subject of the concern, or if the member of staff does not feel able to raise the matter with them, they should raise the concern with the Senior School Leader, Principal, Head of School, CEO, Chair of the Local Governing Committee or Chair of the Board, as appropriate.
- The initial stage will usually be a meeting with the person raising the concern, followed by an assessment of what further action, if any, is required.

During this initial stage, the investigation lead will establish whether:

- there are grounds for concern
- the concern appears to fall within the scope of this policy
- another Trust policy or procedure is more appropriate
- any immediate protective action is required
- external advice, referral or notification is required

Following the initial meeting, the investigation lead will decide on an appropriate course of action.

If there is cause for concern once the initial meeting has taken place, the investigating officer will refer the information to the appropriate senior person. Where the concern relates to a school, this may be the Senior School Leader, Principal, Head of School or Chair of the Local Governing Committee. Where the concern relates to the Trust, this may be the CEO or Chair of the Board. Where the concern relates to safeguarding, the Trust's Safeguarding and Child Protection Policy and relevant LADO procedures will be followed.

If it is decided that no further action will be taken, this will be explained to the person raising the concern where appropriate, normally within **10 working days** of that decision. This may be because:

- there is insufficient evidence to warrant further investigation
- the matter has already been raised and is being investigated
- the matter is more appropriately dealt with under another Trust policy or procedure
- the disclosure does not fall within the scope of this policy

The Senior School Leader, Principal, Head of School, CEO, Chair of the Local Governing Committee or Chair of the Board will be informed of the concern where this is necessary, proportionate and appropriate, even where no further action is to be taken.

Concerns may be raised verbally or in writing. Where a concern is raised verbally, the investigation lead will make a written summary of the concern and, wherever reasonably practicable, agree the accuracy of the record with the person raising the concern.

The investigation lead will explain the following to the person raising the concern:

- how communication will be managed throughout the process
- that the need for confidentiality may prevent the school or Trust giving specific details of any investigation, outcome, disciplinary process or action taken in relation to another individual
- that the identity of the person raising the concern will be protected so far as is reasonably practicable and lawful. There may be circumstances where the Trust is required to disclose

information in order to investigate properly, comply with legal obligations, protect children or others, or ensure procedural fairness
- that the Trust will take reasonable steps to protect the person raising the concern from detriment, victimisation or unfair treatment
- that where a concern is raised reasonably, no disciplinary action will be taken against the person raising the concern simply because the concern is not upheld

Outcome and recommendations:
upon completing the investigation:
- a report will be prepared summarising the concern, findings, conclusions and recommended actions
- recommendations may include management action, disciplinary proceedings, process improvements, safeguarding action or referral to external agencies
- the person raising the concern will be informed of the outcome, subject to legal, safeguarding, confidentiality and employment constraints
- where action is not taken, an explanation will be provided where it is appropriate to do so

All records will be kept confidential and retained in accordance with the Trust's Records Retention Schedule, Data Protection Policy and applicable data protection legislation.
It may be possible for the concern to be resolved by agreeing necessary action or explaining procedures. However, depending on the severity and nature of the concern, it may:
- be investigated by management, internal audit or through the disciplinary process
- be referred to the police, external auditor, LADO, Department for Education or another prescribed body
- form the subject of an independent inquiry

If the investigating officer needs to meet with the person raising the concern, they may be accompanied by a trade union representative, professional association representative, workplace colleague or other appropriate person agreed by the Trust. The companion will provide support only and will not normally answer questions on behalf of the person raising the concern, unless this is agreed as a reasonable adjustment.

A record will be made of the nature and outcome of the concern. The purpose of this is to ensure that a central record is kept which can be cross-referenced with other concerns, complaints or incidents to monitor patterns, identify risks and assist in reviewing the effectiveness of this procedure.

7. What the school asks of whistleblowers

The purpose of this policy is to enable individuals to raise concerns in confidence, without any fear of reprisal. It is important that whistleblowers:
- Do not talk about the concern outside the school or Trust unless it is to report the concern through the proper external channels, e.g. the LA.
- Declare any personal interest in the matter, as the policy is designed to be used in the interest of the public and not for individual matters.

8. Safeguarding Concerns

Low-level concerns regarding staff conduct should normally be reported in line with the Trust's safeguarding and low-level concerns procedures. Where a concern indicates systemic failure, malpractice or deliberate wrongdoing, the whistleblowing policy should be used.

Concerns related to safeguarding must be reported immediately to the designated safeguarding lead, the Trust, or external agencies, such as:

- NSPCC Whistleblowing Helpline (0800 028 0285)
- The Local Authority Designated Officer (LADO)

The DfE using their online reporting form for academies

9. If you are dissatisfied with the response:

If no action is to be taken and/or the individual is not satisfied with the way the matter has been handled, they can:

- make a complaint under the Complaints Procedure Policy,
- escalate their concern to prescribed external bodies, such as Ofsted or the DfE. Contact details for these organisations are provided in Appendix 1.

10. Unfair treatment

Employment tribunal time limits are strict. A claim relating to whistleblowing detriment or dismissal will usually need to be brought within three months less one day of the act complained of or the effective date of termination, subject to ACAS early conciliation rules. Individuals should seek independent advice promptly.

11. Monitoring and Review

This policy will be reviewed annually to ensure alignment with legislative updates, including the DfE Academy Trust Handbook, and best practice guidance. Records of whistleblowing concerns and their outcomes will be maintained confidentially and used to evaluate the effectiveness of this policy.

The Finance, Audit and Risk Committee will receive periodic anonymised reports on whistleblowing activity to provide oversight and assurance regarding organisational culture, safeguarding and internal control.

Appendix 1:

Entity	Name	Role	Email
Schools and Local Governing Committee Chairs			
St. Bernard's Catholic Primary School	Max Fauvet	Chair of the Governors	max.fauvet@stb.newmancatholictrust.com
	Richard Jordan	Principal	Rjordan@stb.newmancatholictrust.com
St Bonaventure's	Mary Furby	Chair of the Governors	Mfurby@stbo.newmancatholictrust.com
	Sarah Ballentine	Principal	sballantine@stbo.newmancatholictrust.com
St Francis Catholic Primary School	Bernie Hinchliffe	Chair of the Governors	Bhinchliffe@newmancatholictrust.com
	Tim Purser	Principal	TPurser@stf.newmancatholictrust.com
St Joseph's Catholic Primary	Shelley-Anne Douglas	Chair of the Governors	SDouglas@newmancatholictrust.com
	Jonathon Deeney	Executive Principal	JDeeney@stj.newmancatholictrust.com
St Nicholas of Tolentine Catholic Primary School	Colleen Collett	Chair of the Governors	colleencollett@newmancatholictrust.com
	Rachael James	Principal	rachaeljames@newmancatholictrust.com
St Patrick's Catholic Primary	Joanne Deasey	Chair of the Governors	JDeasey@stp.newmancatholictrust.com
	Ed Broyd	Principal	Ebroyd@stp.newmancatholictrust.com
St Teresa's Catholic Primary School	Chris Matthews	Chair of the Governors	CMatthews@stt.newmancatholictrust.com
	Samantha Land	Principal	sland@stt.newmancatholictrust.com

Board of Directors			
Director	Chris Izuka	Chair of the Board	chrisizuka@newmancatholictrust.com
Director	Dr Kevin Woodrow	Foundation Director	kevinwoodrow@newmancatholictrust.com
Director	Robert Stewart	Foundation Director	robstewart@newmancatholictrust.com
Director	Chisa Onyejekwe	Foundation Director	chisaonyejekwe@newmancatholictrust.com
Director	Marie Wykes	Foundation Director	Mwykes@newmancatholictrust.com
Director	Rheannah Hall	Foundation Director	rhall@newmancatholictrust.com
Trust Central Team			
Trust Management Team	Daniel Doyle	CEO	CEO@newmancatholictrust.com
	Kimberley Bowgin	CFO	CFO@newmancatholictrust.com
Director of Schools			

Clifton Diocese – Schools and Colleges Alexander House, 160 Pennywell Road, Bristol BS5 0TX. Tel: 0117 902 5599	Secretary of State Department for Education Sanctuary Buildings Great Smith Street London SW1P 3BT Tel: 02079255000

Appendix 2:

List of Prescribed Persons and The Matters For Which They Are Prescribed

The Public Sector Audit Appointments Ltd The proper conduct of public business, value for money, fraud and corruption in local government. PSAA Limited 3rd floor Local Government House Smith Square London SW1P 3HZ
The Charity Commissioners for England and Wales The proper administration of charities and of funds given or held for charitable purposes. whistleblowing@charitycommission.gsi.gov.uk
Children's Commissioner Matters relating to the views and interests of children. Children's Commissioner for England Sanctuary Buildings 20 Great Smith Street London SW1P 3BT
Information Commissioner Compliance with legislation relating to data protection and to freedom of information The Office of the Information Commissioner Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF Tel: 01625 545700
Ofsted Please contact Ofsted if: • you are not satisfied with the service's response after you have followed its complaints procedure • you feel unable to contact the service concerned about this particular issue Email: enquiries@ofsted.gov.uk Tel: 0300 123 1231
DfE To complain or make a disclosure about an Academy please use the complaints portal: https://customerhelpportal.education.gov.uk/
Advisory, Conciliation and Arbitration Service (ACAS) – ACAS operates a national network of helplines which deal with queries about employment matters, including the rights and obligations arising out of employment law. The relevant Local Authority - Under section 18 of the Health and Safety at Work Act 1974 will investigate matters which may affect the health and safety of individuals at work; matters which may affect the health and safety of any member of the public arising out of or in connection with the activities of persons at work.

This policy will be reviewed annually