



Whistleblowing Policy

2026-27 revised edition

Policy owner	Board of Trustees
Approval status	Draft for Board approval
Reviewed / updated	3 October 2026
Next scheduled review	September 2027
Scope	All AET operations in England and Wales
Earlier review trigger	Relevant legal/regulatory change, serious incident, significant organisational change or identified deficiency

This policy replaces the previous AET whistleblowing policy and reflects current whistleblowing law and Charity Commission guidance as checked on 3 October 2026. It is designed to encourage concerns to be raised promptly and safely.

1. Purpose and commitment

Axis Educational Trust (AET) is committed to high standards of openness, integrity, accountability and safeguarding. AET encourages people working for or with the charity to speak up where they reasonably believe there is wrongdoing or a serious risk to people, the charity, charitable funds or the public interest.

AET will not subject a person to dismissal, disciplinary action, victimisation, harassment or other detriment because they have raised a genuine concern or made a protected disclosure. Concerns will be handled sensitively, fairly and as confidentially as practicable.

2. Legal framework

Statutory whistleblowing protection in Great Britain is principally contained in the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 (PIDA). A worker may be protected where they make a qualifying disclosure through an appropriate channel and reasonably believe both that the disclosure is in the public interest and that it tends to show relevant wrongdoing.

A disclosure does not have to be made "in good faith" in order to qualify for statutory protection. AET nevertheless expects concerns to be raised honestly and responsibly. Deliberately making a knowingly false or malicious

allegation may itself be dealt with under AET procedures, but a concern that turns out to be mistaken will not attract action merely because it was not substantiated.

Trustees and volunteers are encouraged to use this policy. They may not always fall within the statutory definition of a "worker" and therefore may not have the same employment-law protections, but AET will apply its non-retaliation principles to them as an organisational commitment.

3. Scope

This policy is available to employees, workers, agency staff, contractors where appropriate, trainees, trustees and volunteers. It should be read alongside AET safeguarding, complaints, grievance, disciplinary, anti-fraud, data protection and health and safety arrangements.

A personal employment grievance that does not raise a wider public-interest issue should normally be handled under the grievance procedure. A safeguarding concern should be reported immediately through safeguarding channels as well as, where appropriate, under this policy.

4. What may amount to whistleblowing

A qualifying disclosure may concern information that the person reasonably believes tends to show that one or more of the following has occurred, is occurring or is likely to occur:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment; or
- deliberate concealment of information tending to show any of the matters above.

Within AET this may include, for example, serious safeguarding failures; fraud, theft or misuse of charitable funds; significant conflicts of interest; bribery or corruption; serious health and safety failures; unlawful discrimination or harassment; serious data protection or cyber-security failures; fundraising misconduct; or attempts to conceal such matters.

5. Fundraising concerns

Concerns about fundraising will be considered in light of the Fundraising Regulator's Code of Fundraising Practice (2025), effective from 1 November 2025. AET will maintain clear routes for concerns and complaints about fundraising and will investigate them fairly and without unnecessary delay.

6. Confidentiality and anonymous reporting

A person may ask for their identity to be kept confidential. AET will take reasonable steps to protect confidentiality, but it cannot guarantee that identity will never need to be disclosed, for example where required by law, a regulator, safeguarding duties, natural justice or court proceedings. If disclosure becomes necessary, AET will normally discuss this with the person first where lawful and practicable.

Anonymous concerns will be considered, although anonymity can make investigation and feedback more difficult. People are encouraged to provide sufficient factual detail and evidence to allow the concern to be assessed.

7. How to raise a concern internally

A concern should be raised as soon as reasonably practicable. It may be raised verbally or in writing. The person should explain the nature of the concern, relevant dates or people, why they believe the matter is serious, and any supporting evidence available. They are not expected to investigate the matter themselves.

Stage 1 - Chief Executive Officer

In the first instance, concerns should normally be raised with the Chief Executive Officer (CEO), who will ensure that the concern is logged, assessed and investigated by an appropriate person who is sufficiently independent of the matters raised.

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Stage 2 - Chair / independent trustee

If the concern involves the CEO, if there is a conflict of interest, or if the person reasonably believes the matter has not been handled properly, it should be raised with the Chair of Trustees or another independent trustee. If the concern involves the Chair, it should be raised with another trustee who is not implicated.

The receiving trustee will ensure an independent review or investigation and will report material findings and actions to the Board, subject to appropriate confidentiality.

8. How AET will respond

The recipient of a concern will promptly assess the information and decide what action is appropriate. This may include an internal investigation, safeguarding referral, suspension of a process or activity, disciplinary action, seeking professional advice, reporting to insurers, or referral to a regulator or law-enforcement body.

- The person raising the concern will be acknowledged and told who is handling it, where practicable.
- Investigations will be proportionate, impartial and documented.
- Only those who need the information for a legitimate purpose will receive it.
- The person raising the concern will be given appropriate feedback on the outcome, subject to confidentiality, data protection and legal restrictions.
- Records will be retained securely in accordance with AET's data retention arrangements.

9. External disclosures

A person does not have to complete AET's internal stages before making a protected disclosure to an appropriate prescribed person where the statutory conditions are met. Depending on the subject, relevant external bodies may include:

- the Charity Commission for England and Wales, which is a prescribed person for matters relating to the proper administration of charities and charitable funds;
- the Fundraising Regulator for fundraising concerns;
- the Information Commissioner's Office (ICO) for data protection matters;
- the Health and Safety Executive or relevant local authority for health and safety matters;
- the police for suspected criminal offences or immediate danger; and
- local authority children's social care, the Local Authority Designated Officer (LADO) or another safeguarding authority where safeguarding duties require it.

Workers considering an external disclosure may wish to obtain independent advice, for example from Acas, a trade union or an independent whistleblowing adviser. Different legal tests can apply depending on who receives the disclosure.

10. Serious incident reporting and regulatory duties

Where a whistleblowing concern indicates an actual or alleged serious incident, the trustees will consider the Charity Commission's serious incident reporting guidance. Ultimate responsibility for ensuring a report is made when required rests with the trustees, even where the practical task is delegated.

Reporting a matter to another body does not necessarily remove the need to report it to the Charity Commission where the Commission's serious incident criteria are met.

11. Protection from retaliation

AET will not tolerate harassment, victimisation, threats, exclusion, detrimental changes to duties, or other retaliation because a person has raised a concern. Any suspected retaliation should be reported immediately to the CEO or Chair and may result in disciplinary or other action.

12. Responsibilities and monitoring

- The Board of Trustees has overall responsibility for this policy and for ensuring an appropriate speak-up culture.
- The CEO and senior managers must communicate the procedure and ensure managers know how to receive and escalate concerns.
- Managers must not investigate concerns in which they have a conflict of interest.
- The Board should periodically review themes, outcomes and learning from whistleblowing concerns without unnecessarily identifying whistleblowers.
- This policy will be reviewed at least annually and sooner following relevant legal or regulatory change, a serious incident, or identified weakness.

13. Key legal and regulatory references

- [Whistleblowing guidance for workers - GOV.UK \(published 1 October 2026\)](#)
- [Charity Commission whistleblowing disclosures 2025 to 2026](#)
- [How to report a serious incident in your charity - Charity Commission](#)
- [Code of Fundraising Practice \(2025\) - Fundraising Regulator](#)
- [Employment Rights Act 1996 / Public Interest Disclosure Act 1998](#)

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