



Financial Malpractice

Whistleblowing Policy

(Making a Disclosure in the Public Interest)

Approved by:	Finance Committee	Date: 11/02/2026
Last reviewed:	February 2026	
Reviewed by:	Ransi Bandara - CFOO	
Next review due by:	February 2028	

Key Information:

- The policy will be next reviewed in: February 2027
- The designated member of staff for Financial Malpractice Whistleblowing is: **Bethan Anderson**
- The Whistleblowing Directors are: Robert Webber and Rob Adams
- This policy applies to employees, workers, contractors, agency workers, volunteers, trustees, local governors and suppliers who perform work for and on behalf of the Trust
- A separate Whistleblowing Policy exists for safeguarding matters – refer to the Trust’s Whistleblowing Policy

Purpose & Commitment

The Rainbow Multi Academy Trust (the Trust) is committed to the highest stands of openness, probity and accountability. This policy provides a clear mechanism for raising concerns about financial malpractice or other serious wrongdoing in the public interest, with protection from detrimental treatment when disclosures are made in accordance with the law.

Legislative Framework

This policy is informed by the Public Interest Disclosure Act 1998 (PIDA) as incorporated in the Employment Rights Act 1996; the Public Interest Disclosure (Prescribed Persons) Order 2014; and the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025, which added HM Treasury and expanded sanctions-related prescribed matters for the Secretaries of State for Business and Trade and for Transport. It also reflects the Sanctions and Anti-Money Laundering Act 2018 and the government’s 2025 review of the UK whistleblowing framework. The Trust will update this policy to reflect any future reforms (including establishment of an Office of the Whistleblower, if enacted).

Scope

This policy enables individuals connected with the Trust to raise concerns at a high level about suspected malpractice or impropriety which are in the public interest.

Definitions

For the purposes of this policy:

- **Whistleblowing / Protected Disclosure:** means disclosing information that, in the reasonable belief of the individual, is made in the public interest and tends to show one or more categories of wrongdoing.
- **Worker:** includes employees and other individuals who perform work for the Trust, such as agency workers, contractors, trainees and volunteers, as applicable
- **Public Interest:** means the concern affects others beyond the person raising it and is not solely a personal grievance.

Examples of Malpractice (illustrative, not exhaustive)

- Financial malpractice, impropriety or fraud; misuse of public funds; falsification of records;

- Failure to comply with a legal obligation (including company law, procurement law or charity law obligations);
- Criminal activity;
- Breaches of UK sanctions (financial, trade or transport), including prohibited transactions, evasion or circumvention;
- Dangers to health and safety or to the environment;
- Improper conduct, serious unethical behaviour, or conflicts of interest;
- Deliberate concealment of any of the above.

Safeguards

Protection

Individuals raising concerns under this policy will be protected from dismissal or detriment when the disclosure is made in good faith, with a reasonable belief that it is in the public interest and tends to show wrongdoing, and when raised through an appropriate route. Victimisation or retaliation will not be tolerated and may lead to disciplinary action.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use follow procedures. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

Disclosures will be handled sensitively and where possible, confidentially. The identity of the whistleblower will be kept confidential so long as it does not hinder or frustrate the investigation. In some cases, the whistleblower may be asked to provide a statement as part of the evidence.

Anonymous Disclosures

Anonymous disclosures will be considered at the Trust's discretion, taking into account the seriousness of the issues, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

The Trust encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously may be less credible, but as above will be considered at the Trust's discretion.

Malicious or Vexatious Allegations

No action will be taken against any individual who makes an allegation in good faith that is not subsequently confirmed. However, malicious, vexatious or knowingly false allegations may

result in disciplinary action. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

Roles and Responsibilities

Trust Board/Directors: own the policy, receive anonymised annual reporting and ensure appropriate resources and independence for investigations.

CEO, Executive Leadership Team, Headteachers: ensure effective procedures, culture and training are in place.

Whistleblowing Directors: act as Board points of escalation independent of line management; may appoint an independent investigating office, who may be an employee of the Trust.

Designated Member of Staff (Financial Malpractice Whistleblowing): first point of contact for concerns; ensures prompt triage and referral.

Investigating Officer: leads enquiries, liaises with auditors/regulators/police as appropriate and reports findings.

All Managers, Senior Leadership Team: create a speak-up culture and signpost this policy.

All Employees/Workers: raise concerns promptly in line with this policy.

How to raise a disclosure / concern

- Ordinarily, raise the concern with your line manager.
- If the concern relates to your line manager or you believe they may be involved, raise it with the Headteacher or the Designated Member of Staff.
- Where the concern relates to the Headteacher, raise it with the Designated Member of Staff, or a Whistleblowing Director.
- Where the concern relates to the CEO or a Director, raise it with the Chair of the Board or an alternate Whistleblowing Director.
- At any stage, you may bypass line management and raise the concern directly with a Whistleblowing Director.

Independent Points of Contact

Designated independent advisers who can provide confidential guidance on routes and implications:

- Rob Parker, Neo:PM - 07900 580428
- Emily Atherton, Neo:PM – emily.atherton@neopeople.net
- Protect, Independent Whistleblowing Charity – 02031172520, www.protect-advice.org.uk

External Reporting to Prescribed Persons

If you reasonably believe the information and any allegation are substantially true and the matter falls within a regulator's remit, you may report to a prescribed person. Examples relevant to financial malpractice include:

- HM Treasury – suspected breaches of UK financial sanctions.
- Secretary of State for Business and Trade – suspected breaches of trade sanctions.
- Secretary of State for Transport – suspected breaches of aircraft or shipping sanctions.
- Department for Education (DfE) / Education and Skills Funding Agency (ESFA) – financial management and governance in academy trusts.
- Financial Conduct Authority/Prudential Regulation Authority/Bank of England – matters within their respective remits.
- Health and Safety Executive – health and safety risks.
- National Audit Office (Comptroller and Auditor General) – matters relating to the audit of public bodies.

For the current list of prescribed people and bodies, see the Department for Business and Trade guidance on GOV.UK. (Search: “Whistleblowing: list of prescribed people and bodies”).

Acknowledgement, Updates and Timescales

The Trust will acknowledge receipt of a concern in writing within 5 working days. The investigating officer will provide written updates at appropriate intervals (normally at least every 20 working days) and will aim to conclude the investigation within 30–60 working days, proportionate to complexity. Where police or regulator involvement requires, timescales may be extended to avoid prejudice to external proceedings.

Investigation Procedure

1. Obtain full details and clarifications of the concern.
2. Notify the subject(s) of the concern at the appropriate time and confirm their right to be accompanied at any interview.
3. Consider early liaison with the Trust's auditors and/or relevant regulator; notify the police where criminal activity is suspected.
4. Conduct proportionate enquiries; keep secure records; maintain confidentiality.
5. Produce a written report with findings and reasons; submit to the Designated Member of Staff/Headteacher and/or Board as appropriate.
6. Where allegations are substantiated, invoke disciplinary or other procedures as appropriate.
7. Inform the whistleblower of the outcome to the extent lawfully possible.

If You Are Not Satisfied

If you believe your concern has not been properly addressed internally, you may raise it in confidence with a Whistleblowing Director, the Chair of the Board, or an appropriate prescribed person. You may also seek independent legal advice.

Record-Keeping and Data Protection

All disclosures will be logged securely. Records will be retained in accordance with the Trust's retention schedule and the UK GDPR / Data Protection Act 2018. Personal data will be

minimised, access-controlled and used only for lawful purposes connected with the investigation and resolution of the disclosure.

Training and Awareness

The Trust will provide periodic training to staff and managers on whistleblowing rights and procedures, and will circulate this policy annually. The policy will be available on the Trust intranet and website.

Monitoring and Reporting

Anonymised data on whistleblowing disclosures and outcomes will be reported annually to the Board. Learning arising from cases will be used to improve systems and controls.

Related Policies and Documents

- Whistleblowing Policy for Safeguarding
- Anti-Fraud, Bribery and Corruption Policy
- Financial Regulations and Scheme of Delegation
- Complaints Policy
- Disciplinary Policy and Procedure
- Grievance Policy

Future Legislative Developments

The Trust will review and update this policy to reflect future legislative changes, including any provisions arising from proposals to establish an Office of the Whistleblower.