



St Chad's
Academies Trust

Whistleblowing Policy

Children first: in the footsteps of St. Chad

As we follow Christ in the footsteps of St. Chad, we seek to be servant leaders who have a desire to see all those, within our Trust family, truly flourish both spiritually and academically

Document information

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Purpose	The purpose of this policy is to ensure that staff feel confident in raising serious concerns and to question and act upon concerns about practice.		
This policy links to:	Complaints Policy Grievance Policy Overarching GDPR Disciplinary Policy Managers Guide - Suspension		

If you would like this information in another language or format, please speak to the Trust.

Telephone: 01543 622 433 – Option 4

Trust website: <https://www.stchadsacademiestrust.co.uk>

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Appendix 1 Raising a concern form

2 Introduction

- 2.1 St Chad's Academies Trust ('the Trust') is committed to ensuring that it provides a strong infrastructure to enable our academies to flourish and improve. The Trust recognises that its leaders and colleagues are central to this success and greatly values their commitment and contribution.
- 2.2 The core values of the Trust form the basis of all discussions with colleagues. We expect all colleagues of St. Chad's Academies Trust to respect and model these values.



3 Scope

- 3.1 St Chad's Academies Trust and its academies are referred to in this policy as the **Academy Trust** or **we**.
- 3.2 All colleagues at one time or another may have concerns about what is happening at work. Often, these concerns are relatively minor and can be easily resolved. Openness, transparency, and accountability are vital components of public service. Colleagues who discover lapses in these areas must be encouraged to come forward and disclose their concerns to someone who can be trusted to act without fear of reprisals. This process is known as 'Whistleblowing'. These issues will be taken seriously and treated in a confidential manner.
- 3.3 The Public Interest Disclosure Act 1998 makes it automatically unfair to dismiss someone on the grounds that they undertook a 'protected disclosure' (i.e., a disclosure made in good faith with a reasonable belief that there has been malpractice or impropriety), and compensation in these circumstances is unlimited. For colleagues to be protected under this law they must take reasonable steps to raise the matter internally first before going outside the organisation and reporting their concerns, such as to the press.

- 3.4 The policy applies to all colleagues and those contractors working for the Academy Trust, including temporary and agency staff. It also covers suppliers and those providing services under a contract with the Academy Trust, in their own premises.

4 Equalities

- 4.1 If any colleague has difficulty at any stage of the procedure because of a disability, they should discuss the situation with the Trust Compliance Officer.
- 4.2 In addition to their work colleague or a representative of a trade union/professional association, colleagues who need a carer (for reasons of their disability), or an interpreter/translator to attend a meeting with them, arrangements should be made with the person hearing the case, at the earliest convenience, to ensure reasonable adjustments can be initiated.
- 4.3 A colleague who requires assistance, as per clause 4.1, accessing a meeting should inform the person requesting their attendance and appropriate venues allowing access will be made available.
- 4.4 The Academy Trust is committed to fairness and equality of treatment for all colleagues and will comply with the requirements of the Equality Act 2010 in the implementation of these procedures.
- 4.5 This document complies with the statutory guidance including “Keeping Children Safe in Education (KCSiE) from the Department of Education. This document forms part of the HR framework to support the Academy Trust to meet their responsibilities with regards to safeguarding.

5 What is the policy for?

- 5.1 The policy has been introduced to:
 - 5.1.1 encourage colleagues to feel confident in raising serious concerns and to question and act upon concerns about practice.
 - 5.1.2 provide avenues for colleagues to raise those concerns and receive feedback on any action taken.
 - 5.1.3 ensure that colleagues receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
 - 5.1.4 reassure colleagues that they will be protected from possible reprisals or victimisation if they have reasonable belief that there is malpractice or impropriety and have made a disclosure in good faith.

6 Examples of areas covered

- 6.1 The policy is intended to cover the following areas of concern (this list is not exhaustive):
 - 6.1.1 Lapses in child protection provision.
 - 6.1.2 Conduct which is an offence or a breach of the law/statutory powers.
 - 6.1.3 Disclosures related to miscarriages of justice.
 - 6.1.4 Health and safety risks, including risks to the public as well as other colleagues

- 6.1.5 Damage to the environment.
 - 6.1.6 Unauthorised use of public funds including action against Standing Orders or Financial Regulations.
 - 6.1.7 Possible fraud and corruption.
 - 6.1.8 Any other unethical conduct or improper conduct; or
 - 6.1.9 Concealment of any of the above.
- 6.2 Or it may be something that:
- 6.2.1 Makes a colleague feel uncomfortable in terms of known standards; or
 - 6.2.2 Is against Trust policies and procedures.
- 6.3 The policy is not intended to replace the Academy Trust Complaints policy or Grievance policy or other established procedures.
- 6.4 In cases where the disclosure may result in disciplinary action, referral to the Trust Disciplinary policy will be made in line with other relevant Trust policies and procedures i.e., Manager Guidance – Suspension.

7 When to raise a concern.

- 7.1 Where a colleague becomes aware of or suspects that unauthorised or irregular activity is taking place, there is an implied duty for colleagues to report such wrong doings. Colleagues may, however, be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling that it is none of their business or that it is only a suspicion. The Trust would always encourage in the first instance a confidential conversation with the Trust Compliance Officer who will then advise on the appropriate course of action.
- 7.2 This policy has been put in place to enable colleagues to raise their concerns about such malpractice at an early stage and in the right way. It is better that the matter is raised when it is a concern rather than wait for proof. Colleagues are encouraged to use this policy if ever there is an occasion when an issue is troubling or is of concern. The Whistleblowing policy is primarily for concerns where the interests of others or the Academy Trust itself is at risk.
- 7.3 The Academy Trust is committed to this policy. Any colleague raising a genuine concern under this policy will not be at risk of losing their job or suffering any form of retribution as a result. Provided it is an act of good faith, it does not matter if a colleague is mistaken. Of course, this assurance is not extended to anyone who maliciously raises a matter they know is not true.
- 7.4 The Academy Trust will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that someone might want to raise a concern in confidence under this policy. If a colleague asks to have their identity protected, it will not be disclosed without their

consent. If the situation arises where we are not able to resolve the concern without revealing a colleague's identity (for instance because their evidence is needed in court) this will be discussed fully with them as to whether and how we can proceed.

- 7.5 Remember that if a colleague does not disclose who they are, it will be much more difficult for the Academy Trust to investigate the matter, to protect their position and/or to give feedback. Accordingly, while the Academy Trust consider anonymous reports, this policy is not well suited to concerns raised anonymously.
- 7.6 In all cases an investigation will be conducted, and findings recorded, however where concerns have been raised anonymously, feedback will not be provided.

8 How to raise a concern

- 8.1 Any concern should be raised at the earliest opportunity. This can be done either by phone or in writing. The formal confidential reporting (whistleblowing) form can be found at Appendix 1, which should be used to report your concerns. Raising the concern in writing will set out the background and history of the concern and ensure effective management of the matter. If a colleague prefers to contact by phone, Appendix 1 should be used for recording the conversation and to act as a prompt, to ensure collation of the necessary information and to support the opportunity to establish the facts. Although colleagues will not be expected to prove beyond doubt the truth of the allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern. Malicious allegations may lead to disciplinary action being taken.

Next steps outlined in clause 8.2 – 8.5-are in line with the levels of responsibility and accountability within the Trust Scheme of Delegation.

- 8.2 Where the issue concerns a colleague, other than the Exec-/Principal, it should be brought to the attention of the Exec-/Principal, in the first instance who will notify the Trust Compliance officer.
- 8.3 Where the concern relates to the Exec-/Principal this should be escalated to the Chair of C/LAC who must liaise with Trust Compliance Officer to be assured of next steps in the management of the disclosure.
- 8.4 If Chair of C/LAC is suspected, or the concern relates to joint-enterprise between the Exec-/Principal and Chair of C/LAC, the concern must be escalated to the Trust Compliance Officer. Based on the seriousness or sensitivity of the matter, the concern may be escalated accordingly in line with the flow chart referenced at clause 8.5.
- 8.5 Colleagues should normally raise concerns with their immediate line manager. However dependent upon the seriousness and sensitivity of the issues involved and who is suspected of the malpractice, for example, if you believe that senior management is involved, you should approach any of the following as appropriate:



8.4 Colleagues who want to use the procedure but feel uneasy may wish to seek advice from their trade union/professional body. A colleague may also seek external advice from the Citizens Advice Bureau, the police or “Public Concern at Work” (0207 404 6609)

9 How the Academy Trust will respond

9.1 Initial enquiries will be made by the Designated Officer to determine whether an investigation is appropriate and what form it should take. Some concerns may be resolved by agreed action without the need for investigation. In all cases, concerns will be recorded, and the findings will be logged by the Trust Compliance Officer and reported termly to the Trust Board.

9.2 The Designated Officer will acknowledge the concern within 48 hours, from receipt, via electronic communication (email)

9.3 Within 15 school days the person to whom the matter has been referred to, will:

- Contact necessary parties, if required
- Complete their investigation, where reasonable and necessary
- Determine further actions, where required, which may include investigation by management, referral to auditors and / or referral to the police and
- Outline reference to other Trust policies, where applicable i.e., Disciplinary, Grievance, Code of conduct. The timelines outlined within other Trust policies may supersede the timeline within this policy. In all cases the concerned party will be notified accordingly.
- The Designated Officer will feedback to the concerned party, on next steps and signpost to support mechanisms, which may include confidential counselling.

- 9.4 Where any meeting is arranged, off-site if requested, the colleague may be accompanied by a work colleague who may be a trade union/professional representative.
- 9.5 The Academy Trust accepts that all concerned parties need to be assured that the matters will be properly investigated. Subject to legal constraints and where possible, those who have raised the concern will be informed of the outcome of any investigation.
- 9.6 Any attempt to victimise a person who has reported a concern under this procedure will be dealt with under the Academy Trust Disciplinary Procedure.
- 9.7 False or malicious reports - the Whistleblowing policy is designed to deal with reasonable concerns and to consider reports that colleagues have filed which they reasonably believe to be true. Reports made under the policy must be made in good faith. If a colleague submits a false concern that is made in bad faith (e.g., out of spite or for personal gain) action will be taken against you under the Academy Trust Disciplinary Policy.
- 9.8 Where you feel dissatisfied with the outcome you can find further information at:
<https://www.gov.uk/whistleblowing>

Appendix 1 – Reporting a concern form

Formal Confidential Reporting (Whistleblowing)	
Employee's name:	
Employee's job title:	
Employee's preferred contact method and details:	
Date:	
Does your public interest disclosure relate to your line manager?	Yes/No
Summary of disclosure:	
Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.	
Please provide the names and contact details of any people involved in your concerns, including witnesses.	
Outcome requested:	
Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.	

Declaration:	
I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the organisation taking disciplinary action against me.	
Form completed by:	
Signature:	
For completion by St Chads Academies Trust:	
Date form received by St Chads Academies Trust:	
Name of recipient and job role:	
Signature:	