



Confidential Reporting (Whistleblowing) Policy

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The Whistleblowing policy is designed to sit alongside other Severn Academies Educational Trust policies, eg Safeguarding, Complaints, Financial Code of Practice and Grievance (this list is not exhaustive).

1. Introduction and purpose

- 1.1 The Directors and staff at Severn Academies Educational Trust ("The Trust") operate all aspects of the Trust's activities with full regard to high standards of conduct and integrity. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, trustees, directors, governors, consultants, contractors, volunteers, interns, casual workers and agency workers.
- 1.3 The policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Trust without fear of victimisation, subsequent discrimination, disadvantage or dismissal.
- 1.4 This policy is intended to encourage and enable you to raise serious concerns in the first instance within the Trust rather than ignoring a problem or 'blowing the whistle' outside the organisation.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.6 This policy is not intended to be used in place of raising general concerns about your treatment at work for which the Grievance Policy or the Anti-Harassment and Bullying Policy might be a more appropriate vehicle to attempt to resolve a dispute.
- 1.7 This policy has been written in line with the government guidance on whistle-blowing. We also take into account the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996.

2. What is whistleblowing?

- 2.1 Whistleblowing is the reporting of suspected wrongdoing, danger or malpractice in relation to our activities. This includes:
 - bribery
 - facilitation of tax evasion
 - fraud
 - any other criminal activity
 - miscarriages of justice
 - breach of any legal obligation
 - danger to the health and safety of any individual
 - damage to the environment
 - the deliberate concealing of information about any of the above
 - concerns about the Safeguarding of Children under Keeping Children Safe in Education or
 - unethical conduct which does not uphold the values of the Trust.

This list is not exhaustive.

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3. How to raise a concern

- 3.1 We hope that in many cases you will be able to raise any concerns with your Headteacher. However, where you prefer not to raise it with your manager for any reason, you should contact the CEO. Concerns around the CEO should be raised with the Chair of the Board of Trustees. Contact details are at the end of this policy.

When raising concerns, individuals should do so in writing, including 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

The Trust would encourage individuals to let their identity be known when they raise concerns, as anonymous concerns can be challenging to investigate.

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](http://www.protect-advice.org.uk) (www.protect-advice.org.uk), or they can be contacted on 020 31172520.

Once an individual has raised a concern, the school/trust 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.

4. Interview and investigation

- 4.1 The initial stage will be a meeting with the whistle-blower, and then an assessment of further action will be discussed. During this initial stage, the headteacher will establish if:

- There are grounds for a concern and that it is genuine.
- The concern was raised in accordance with this policy.

If the concern has not been submitted in writing, this will be requested at this meeting or a summary of the concern will be taken during the meeting.

It will be made clear at the meeting:

- How we will communicate with the complainant throughout the process. It should be noted, the need for confidentiality may prevent the school giving the complainant specific details of any necessary investigation or any necessary disciplinary action taken as a result of the concern.
- That the complainant's identity will be kept confidential from the alleged wrongdoer.
- That the governing board will do everything in its power to protect the complainant from discrimination.
- That if the concern is genuine, even if the concern is not confirmed, no disciplinary action will be taken against the complainant.

If clear evidence is uncovered that the complainant's concern is malicious or unfounded, disciplinary action may be brought against them.

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A record will be kept of the seriousness of the issues raised and the credibility of the concern. All records will be kept confidential and will be stored in line with the school's Records Management Policy.

It may be possible for the concern to be resolved by simply agreeing the necessary action or explaining procedures to the alleged wrongdoer; however, depending on the severity and nature of the concern, it may:

- Be investigated by management, an internal audit or through the disciplinary process.
- Be referred to the police or an external auditor.
- Form the subject of an independent inquiry.

If the investigating officer needs to talk to the whistle-blower, they are permitted to be accompanied by a trade union representative, a professional association representative, a friend or a fellow member of staff not involved in the area of work that the concern relates to. This person will provide support only and will not be allowed to become involved in the proceedings.

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 complaints to monitor any patterns of concern across the school and to assist in monitoring the procedure.

4. Confidentiality

- 4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity confidential and only reveal it where necessary to those involved in investigating your concern.

5. External disclosures

- 5.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 5.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. You can contact Protect (Formerly Public Concern at Work), an independent charity providing advice to those who feel that they have a concern they wish to raise under Whistleblowing. Their contact details are at the end of this policy.

If a member of staff feels they should report a concern to the ESFA, they should use the [online contact form](#).

Appropriate whistleblowing procedures are in place for concerns about poor or unsafe practice and potential failures in the school's safeguarding system to be raised with the SLT. However, if a member of staff feels like they are unable to raise a safeguarding-related concern with the school, 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 LADO.

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The school, or the appropriate external agency, will acknowledge receipt of a disclosure but, unless additional information is required, will not contact or engage in dialogue with the whistle-blower, as this may undermine the legitimacy of the investigation outcome.

6. Protection and support for whistle-blowers

- 6.1 We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the CEO immediately.
- 6.3 You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue you personally for compensation in an employment tribunal.
- 6.4 However, if we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower may be subject to disciplinary action.
- 6.5 Protect, a Whistleblowing Charity, operates a confidential helpline. Their contact details are at the end of this policy.

7. Contacts

Chief Executive Office
T: 01562 542574
E: ceo@saet.co.uk

Chair of the Board of Trustees
T: 01562 542574
clerk@saet.co.uk

Protect (formerly Public Concern at Work) Independent Charity
Telephone 020 3117 2520
Email whistle@protect-advice.org.uk
Website: www.pcaw.org.uk