



THE NEW GUILD TRUST

Whistleblowing Policy

POLICY

This policy has been adopted on behalf of all four academies in The New Guild Trust:

Moorpark Junior School

Jackfield Infant School

Alexandra Junior School

Alexandra Infant School

Approval and Review

| | |
|--|------------------|
| Committee to Approve Policy | Trust Board |
| Date of Board / Academy Committee Approval | July 2020 |
| Chair of Board / Academy Committee | Mrs L Eagle |
| Signature | <i>L Eagle</i> |
| Accounting Officer | Mrs Karen Peters |
| Signature | <i>K Peters</i> |
| Policy Review Period | 12 months |
| Date of Policy Review | July 2021 |

| Version | Date Approved | Changes | Reason for Alterations (from and to) | |
|---------|---------------|---------|--------------------------------------|--|
| V1 | June 2019 | | Initial version | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

CONTENTS

- 1 POLICY STATEMENT
- 2 WHO IS COVERED BY THIS POLICY?
- 3 WHAT IS WHISTLEBLOWING?
- 4 RAISING A WHISTLEBLOWING CONCERN
- 5 CONFIDENTIALITY
- 6 EXTERNAL DISCLOSURES
- 7 INVESTIGATION AND OUTCOME
- 8 IF YOU ARE NOT SATISFIED
- 9 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS
- 10 RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY
- 11 CONTACTS

POLICY STATEMENT

1.1 We are committed to conducting our New Guild Multi Academy Trust with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

1.2 The aims of this policy are:

1.2.1 to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;

1.2.2 to provide staff with guidance as to how to raise those concerns; and

1.2.3 to reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the New Guild Multi Academy Trust, including officers, trustees, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as **staff** in this policy).

WHAT IS WHISTLEBLOWING?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

3.1.1 criminal activity;

3.1.2 miscarriages of justice;

3.1.3 danger to health and safety;

3.1.4 damage to the environment;

3.1.5 failure to comply with any legal or professional obligation or regulatory requirements;

3.1.6 bribery;

- 3.1.7 financial fraud or mismanagement;
- 3.1.8 negligence;
- 3.1.9 breach of our internal policies and procedures;
- 3.1.10 conduct likely to damage our reputation;
- 3.1.11 unauthorised disclosure of confidential information;
- 3.1.12 concerns about the harm or risk of harm to children;
- 3.1.13 the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

RAISING A WHISTLEBLOWING CONCERN

4.1 We hope that in many cases you will be able to raise any concerns with your line manager or [Exec Head/ Head Teacher/ Head of school – all known as the Headteacher in this policy]. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.

4.2 However, where the matter is more serious, or you feel that your line manager or the Head Teacher has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer: Accounting Officer/ CEO: Karen Peters. If the matter relates to the CEO you should contact the Chair of Trustees for the Multi Academy Trust, David Webster. Contact details are set out at the end of this policy.

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

CONFIDENTIALITY

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

EXTERNAL DISCLOSURES

6.1 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.

6.2 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. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

6.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4 for guidance.

INVESTIGATION AND OUTCOME

7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

7.2 In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

7.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

IF YOU ARE NOT SATISFIED

8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

8.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the Governors of the local community governing body or relevant external organisations. See section 11 for contacts.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

10.1 The New Guild Multi Academy Trust has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

10.2 The Whistleblowing Officer has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

10.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

11 HOW TO TAKE THE MATTER FURTHER & CONTACTS

11.1 Although every attempt should be made to deal with serious concerns internally in the first instance, if you believe that the concerns you have raised have not been dealt with satisfactorily, or, you reasonably believe that you might be victimised or vital evidence stolen or destroyed, you can make an "external disclosure".

11.2 To make an external disclosure you must:

- Make the disclosure in the reasonable belief that the disclosure is in the public interest.
- Reasonably believe that the information disclosed, and any allegation/concern contained in it, are true;
- Ensure the disclosure is not for personal gain;
- Ensure that in all circumstances of the case it is reasonable to make the disclosure.

Examples of organisations that you can make an external disclosure to are:

- The school's Audit department
- An elected member of the City Council
- A member of school's Local Community Governing Board
- OFSTED
- Stoke on Trent Safeguarding Children Board
- The Police
- A professional body such as the Trade Union
- The Health & Safety Executive
- The Information Commissioner

If you do raise matters outside the school you must not disclose confidential information, for example individual's names or personal circumstances.

| | |
|--|--|
| <p>Whistleblowing Officer</p> | <p>Karen Peters – Accounting Officer/ CEO The New Guild Multi Academy Trust 01782 234440 Kpeters1@moorparkjunior.co.uk</p> <p>David Webster – Chair of the Trust Board. The New Guild Multi Academy Trust</p> |
| <p>Trade unions</p> | <p>12.0 External Contacts List Trade Unions NUT – Ruth Quigley Mobile: 01782 722407 ATL – Peter Lane Mobile: 07870 902006 NASUWT – John Rimmer / Paula Rowe/ Mobile: 07824 143050 / 07824 143053 Telephone: 01214 536150 Ext 6294 / 6291 NAHT – Jill Bennett Mobile: 07947 247987 UNISON – Tony Jones Telephone: 01782 235452 GMB – Mark Bergman Telephone: 01827 66001 UNITE – Steven Williams Office: 01782 219800</p> |
| <p>Department for Education</p> | <p>https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools</p> <p>https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2</p> |
| | |