



## **Whistleblowing Policy**

Policy Code:	HR23
Policy Start Date:	September 2016
Policy Review Date:	September 2017

Please read this policy in conjunction with the policies listed below:

- HR3 Grievance Procedure
- HR12 Staff Disciplinary Procedure



## **1. Policy Statement**

- 1.1 The Trust seeks to run all aspects of school business and activity with full regard for high standards of conduct and integrity. 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 and to address them when they do occur.
- 1.2 The aims of this policy are:
- a. 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.
  - b. To provide staff with guidance as to how to raise those concerns.
  - c. To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy covers all employees, consultants, contractors, volunteers, casual workers and agency workers.
- 1.4 This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

## **2. Responsibility and Implementations**

- 2.1 The Pay, Performance and HR Committee has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Head of HR 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.

- 2.2 The Head of HR, in conjunction with the Pay, Performance and HR Committee, should review this policy from a legal and operational perspective at least once a year.
- 2.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.



### 3. Introduction

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

- (a) criminal activity;
- (b) failure to comply with any legal or professional obligation (or regulatory requirements);
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) bribery (under our Anti-corruption and Bribery Policy);
- (f) financial fraud or mismanagement;
- (g) negligence;
- (h) breach of our internal policies and procedures;
- (j) conduct likely to damage our reputation;
- (k) unauthorised disclosure of confidential information;
- (l) inappropriate use of school assets or funds;
- (m) the deliberate concealment of any of the above matters.

This list is not exhaustive.

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 Trusts Grievance Policy.

3.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from Head of HR.

### 4. Raising a Whistleblowing Concern

4.1 You should be able to discuss any concerns about wrongdoings or dangers at work as part of the normal professional interaction between you and your line manager and, in many cases, these will be dealt with to your satisfaction. Alternatively you may wish to raise any concerns with your line manager more formally, either in person or 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 Head of HR.

- 4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact:

Jayne Wilson – Head of HR

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

## **5. Confidentiality**

- 5.1 The Trust hopes 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 The Trust does 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 Head of HR 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, which offers a confidential helpline. Their contact details are at the foot of this policy.

## **6. Investigation and Outcome**

- 6.1 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.
- 6.2 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.



6.3 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.

6.4 If we conclude that any whistleblower has made false accusations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

## **7. If you are not satisfied**

- a. 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.
- b. If you have genuine concerns about how we have handled your whistleblowing disclosure, you can write to the Clerk to the Trustees. The Clerk will investigate whether this policy's procedures have been followed in the case in question and notify you of his/her findings accordingly. The Clerk can ask for another assessment (6.1) to take place but does not have the power to re-investigate the original complaint/disclosure.

## **8. External Disclosures**

8.1 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.

8.2 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 foot of this policy.

8.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. 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 Head of HR.



## **9. 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 under this policy, even if they turn out to be mistaken.
- 9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. 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 Head of HR immediately. If the matter is not remedied you should raise it formally using The Trust's Grievance Procedure.
- 9.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

## **10. Contacts**

<b>Head of HR</b>	Jayne Wilson 01522 871330 <a href="mailto:jwilson@prioryacademies.co.uk">jwilson@prioryacademies.co.uk</a>
<b>Clerk to the Trustees</b>	Martin Mammatt 01522 871329 <a href="mailto:mmammatt@prioryacademies.co.uk">mmammatt@prioryacademies.co.uk</a>
<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>

## **11. Policy Change**

This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.



## **The Priory Federation of Academies Whistleblowing Policy**

This Policy has been approved by the Pay, Performance and HR Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.