

Whistleblowing Policy

DATE: January 2023

OWNED BY: Kirstie McDermott, Chief Finance Officer

APPROVED BY: Trust Board

REVIEW DATE: January 2024

WICKERSLEY P

c/ Clifton Community School, Clifton, Bristol, Gloucestershire, BS2 9BN

Crail: 01709 807600

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General Whistleblowing Concerns

Anyone with any whistleblowing concerns of any nature can email whistleblowing@wickersleypt.org.

For specific concerns relating to HR, Finance, Safeguarding etc, please see Appendix C on Page 16.

Adam Cloney - Director Advisor

whistleblowing@wickersleypt.org

01709 807600 extension 2215

Helen O'Brien – CEO

hobrien@wickersleypt.org

01709 807600 extension 2207

George Scott – Director, Chair of Audit and Risk Committee

whistleblowing@wickersleypt.org

Contents

1. Introduction	4
2. Aims	5
3. Roles and Responsibilities	6
4. Anonymous Disclosures and Confidentiality	7
5. Untrue Disclosures	7
6. Safeguards	8
7. Procedure	8
8. Raising Concerns Externally	9
9. How the Trust Will Respond	11
10. How the Matter Can Be Taken Further/Right of Appeal	12
11. Communication	12
12. Training	12
13. Monitoring & Review	12
14. Confidentiality & Data Retention	13
15. Links to Other Policies	13

Appendix A – Whistleblowing Policy

1 – Introduction

- Possible fraud and corruption
- Sexual or physical abuse of stakeholders
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Employees may wish to consider discussing their concern with a colleague or their Trade Union Representative first.

Where the concern related to a member of the senior leadership team, it may be appropriate to go outside the normal line management structure, to an independent third party. Where the concern relates to a contractor working on the school site, the concerns should be raised with a member of the Senior Leadership Team.

The whistle blower has the right to consult with and be accompanied by a Trade Union Representative, during the operation of the procedure under the policy. If the whistle blower is not an employee they also have the right to consult with and be accompanied by a Trade Union Representative during the operation of the procedure under the policy.

A free, confidential employee helpline service (tel: 020 3117 2520) is provided by the independent charity "Protect" which offers independent advice to anyone worried about malpractice in the workplace. Further information is available online at www.pcaw.org.uk. For staff who do not feel able to raise concerns regarding child protection failures internally, staff are now able to report their concerns via the NSPCC whistleblowing helpline on 0800 028 0285 or by email: help@nspcc.org.uk.

The Trust will maintain a register of complaints lodged under the policy, report those complaints to the relevant body and will make available for external inspection, such reports/statistical information as may be required. The relevant body may be, for example, The Financial Services Authority, the Regional Schools Commissioner, Local Professional Association Trade Union, and Exam Board or the Local Authority.

Where applicable, data should be kept in line with the Trust's Data Retention Statement. Retention of data will be proportional to the purpose for which the data is collected, whilst taking into account any legal statutory requirements in terms of retention periods.

8 – Raising Concerns Externally

Concerns about exceptionally serious issues may be raised outside the organisation, for example to the Press, Police or other external body. For this to be deemed a protected disclosure under the legislation, however, the individual making the disclosure through an external route must show;

- There is reasonable belief that raising the issue internally will result in the individual suffering a detriment
- That evidence will be destroyed or concealed
- That they have previously made a disclosure of substantially the same information to the employer or prescribed person

An appropriate organisation for an external complaint would be the Education and Skills Funding Agency (EFSA). [https://www.gov.uk/government/organisationseuo71.6 \(/a0.004 Tc --1.3 \(o\)-6.6 \(n\)d\)5.3 \(en\)5.2 \(c\)1.7](https://www.gov.uk/government/organisationseuo71.6 (/a0.004 Tc --1.3 (o)-6.6 (n)d)5.3 (en)5.2 (c)1.7)

One option for external whistleblowing is via 'prescribed persons'. Prescribed persons are mainly regulators and professional bodies. A complete list of prescribed persons can be found at: <https://www.gov.uk/government/publications/blowing-the-whistle-list>

The school/Trust will take steps to minimise any difficulties which employees may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings the school/Trust will arrange for the employee to receive advice and guidance as appropriate.

All notes from any investigation meeting(s) with the complainant will be shared with them once finalised.

The Trust accepts that employees need to be assured that the matter has been properly addressed.

13 – Monitoring and Review

The Trust will review this policy and assess its implementation and effectiveness annually in consultation with the recognised Trade Unions, if appropriate. The policy will be promoted and implemented throughout all schools.

The Audit and Risk Committee is responsible for regular reviews of the whistleblowing policy in line with legislation and any major changes to the policy will be consulted on with Trade Unions. The committee will log and report any incidents or significant risks to the Board of Directors.

14 – Confidentiality and Data Retention

The employer will endeavour to protect the identity of anyone raising a concern who does not wish to be named.

Confidentiality will also be maintained during investigation and hearings other than in circumstances where there is a need for disclosure.

Breaches of confidentiality will be investigated and may be dealt with under the WPT Disciplinary Policy.

Any documentation or evidence collected in conjunction with the application of this policy will be treated as confidential and information will only be shared with parties on a need to know basis.

Where applicable, data should be kept in line with the Trust's Data Retention schedule. Retention of data will be proportional to the purpose for which the data is collected, whilst taking into account any legal statutory requirements in terms of retention periods.

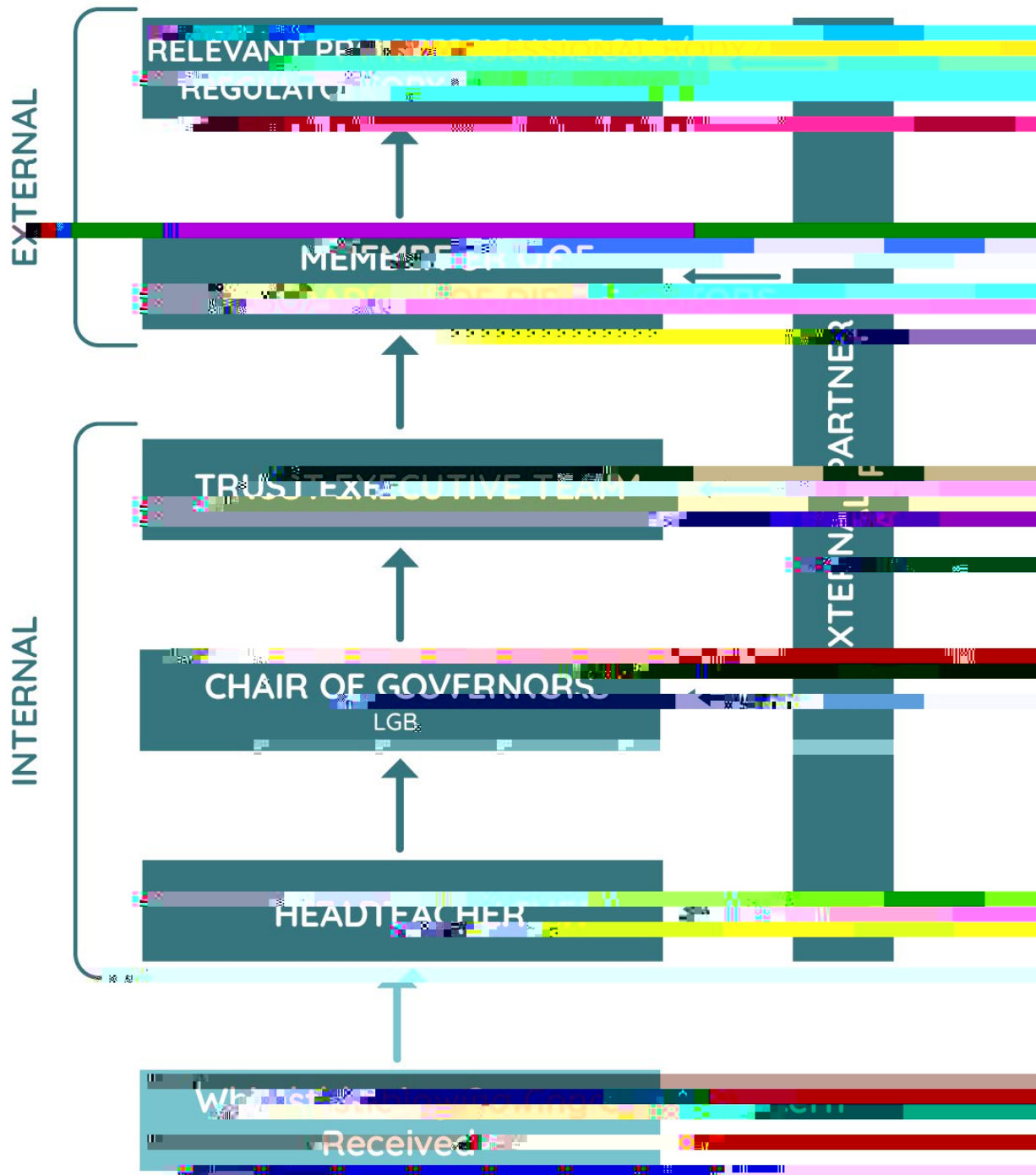
15 – Links to Other Policies

This policy links with our policies on:

- Staff Code of Conduct
- Grievance
- Harassment and Bullying
- Equal Opportunities
- Disciplinary

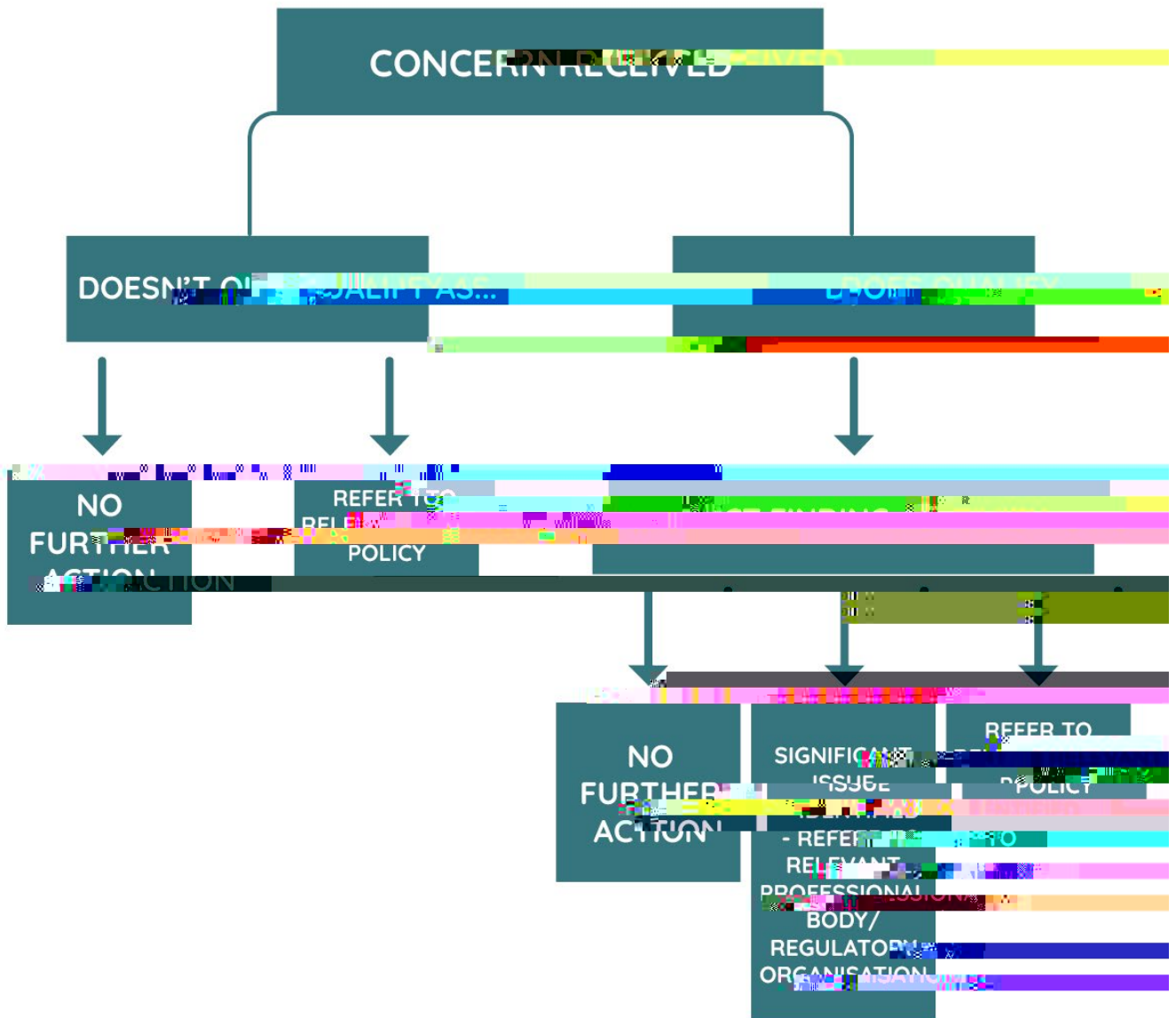
APPENDIX A

Whistleblowing Procedure – Whistleblower



APPENDIX B

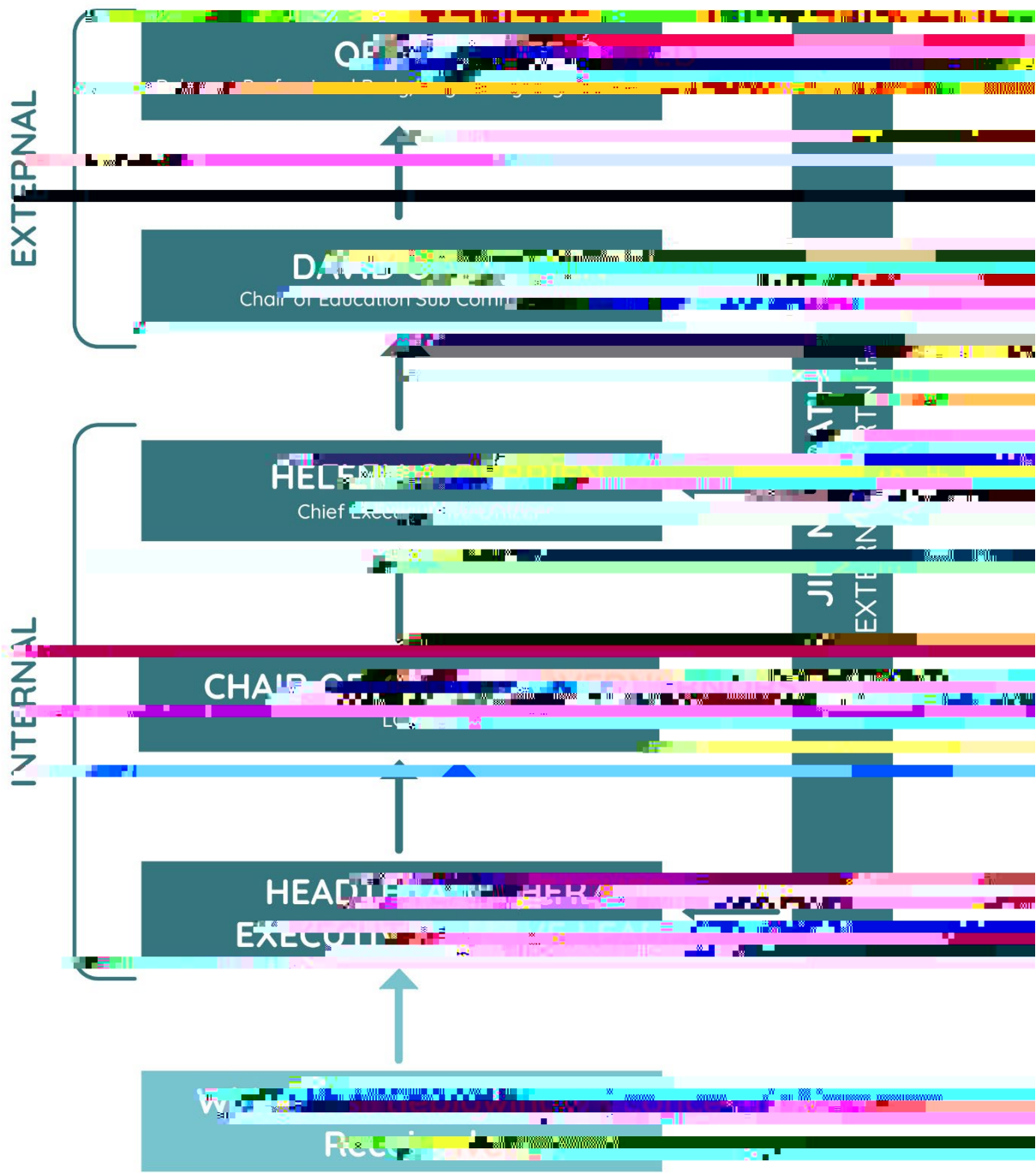
Trust Response Procedure



Keep the whistleblower updated throughout the process (if necessary).

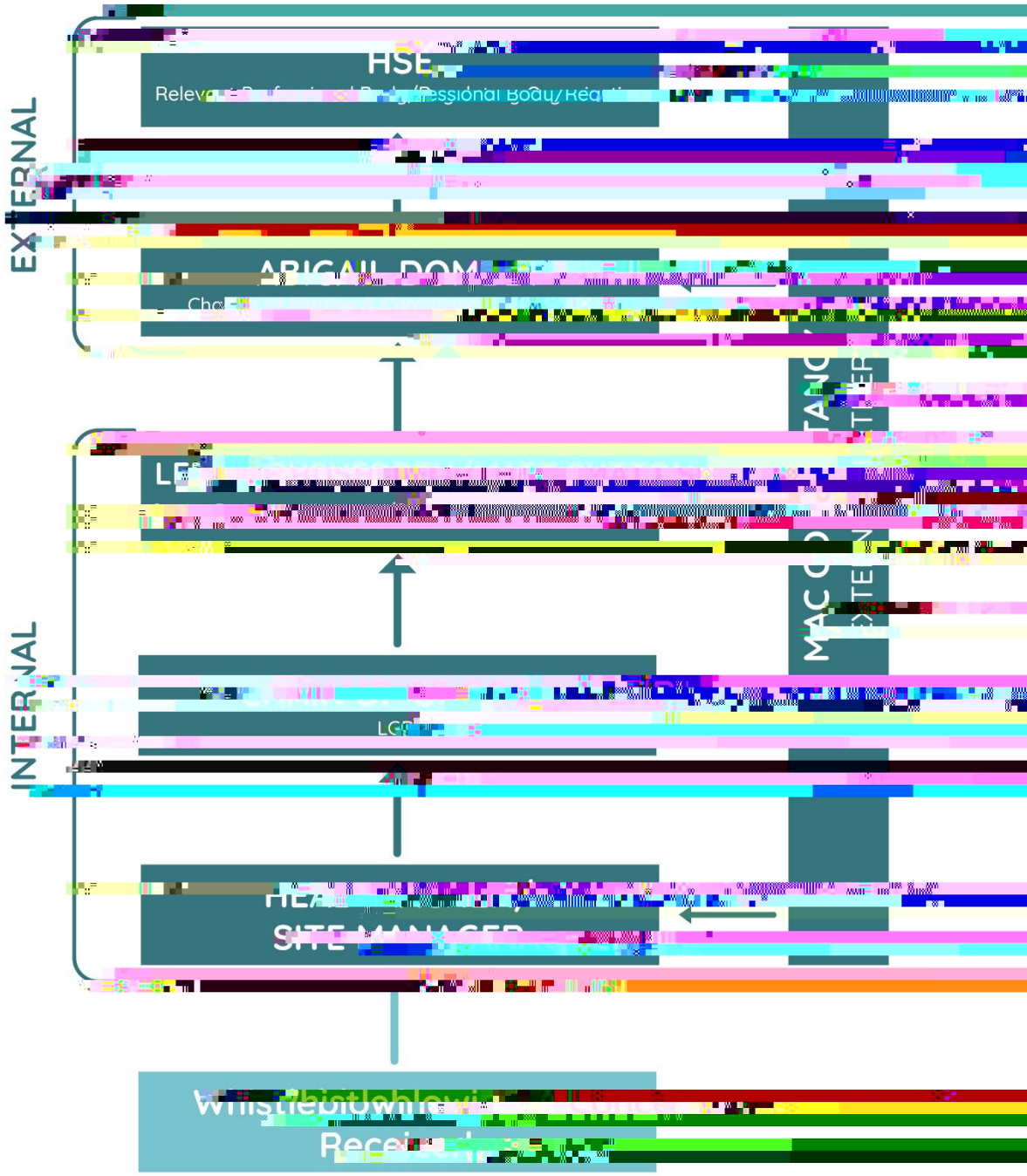
APPENDIX C Whistleblowing Procedure by Department

School Performance



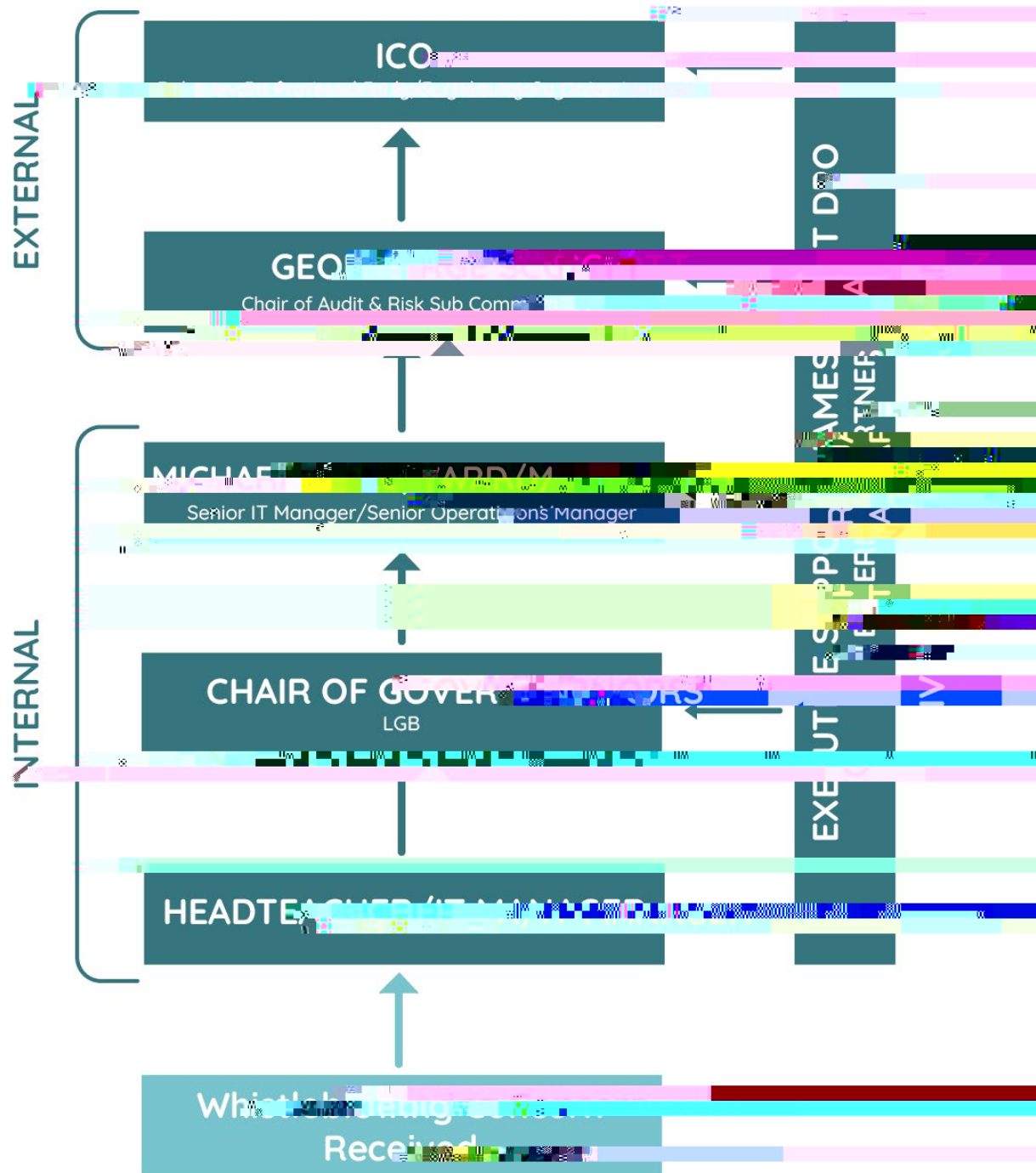
See Appendix D for contact details.

Health & Safety/Compliance



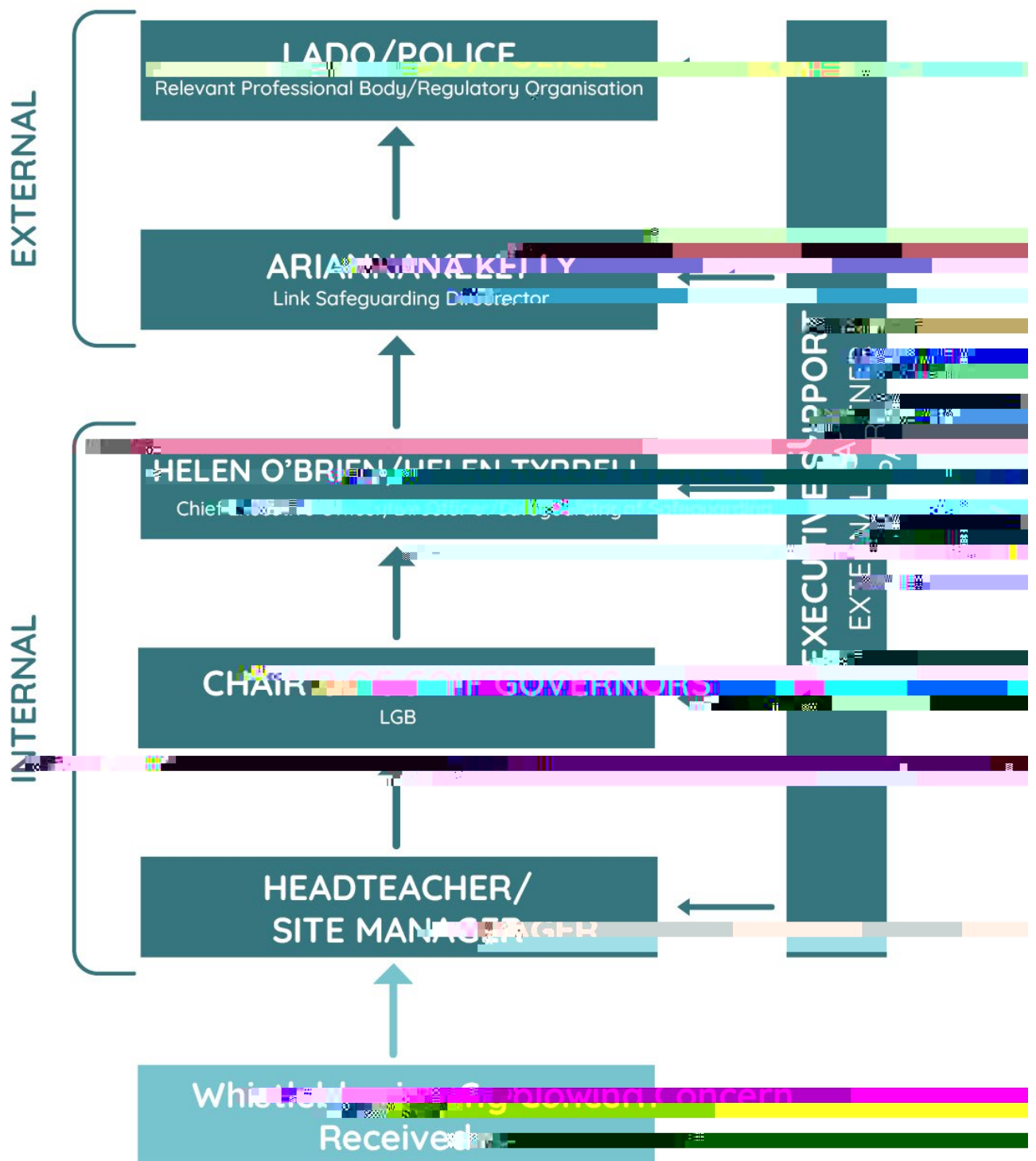
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Data Security



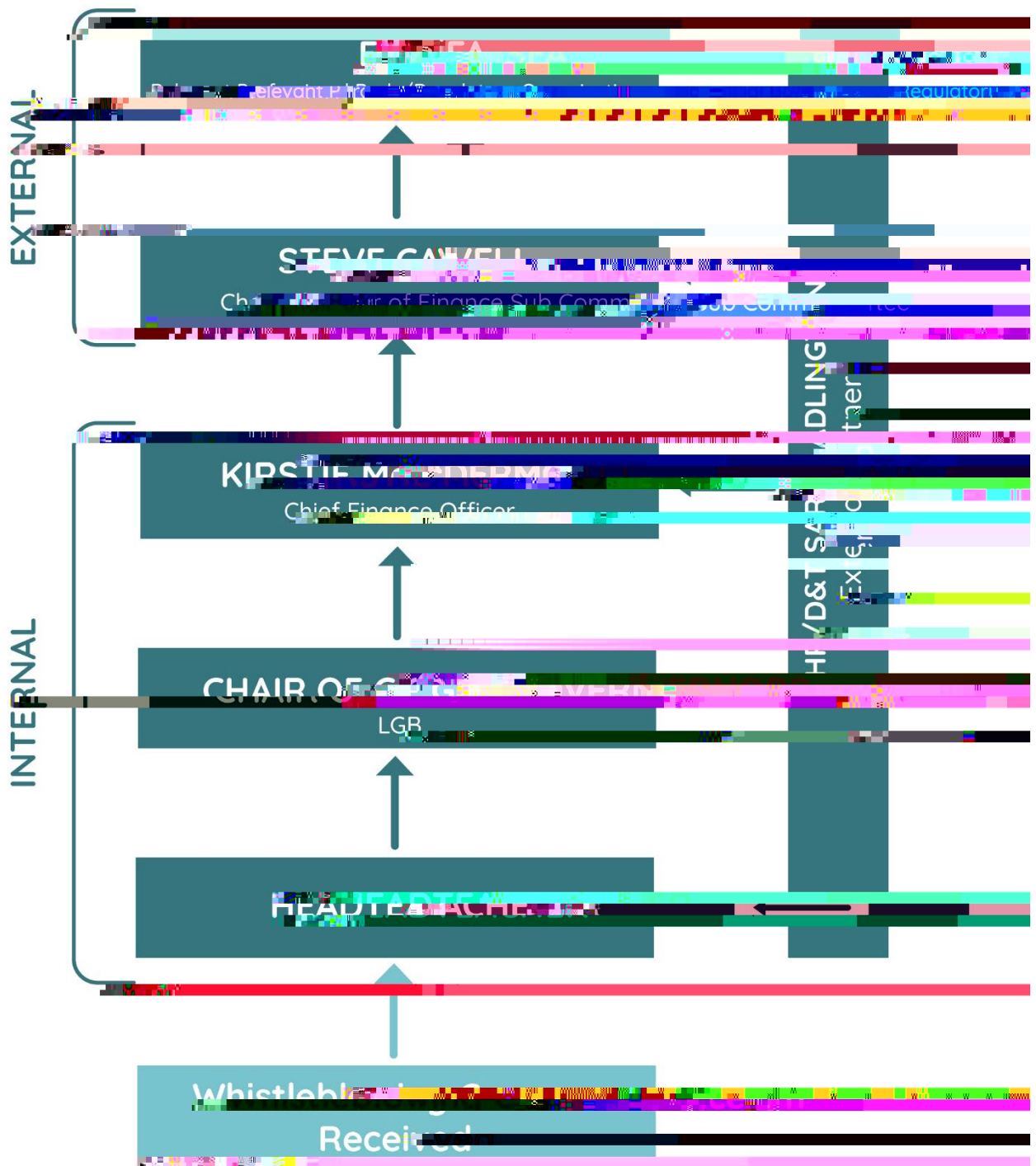
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Safeguarding



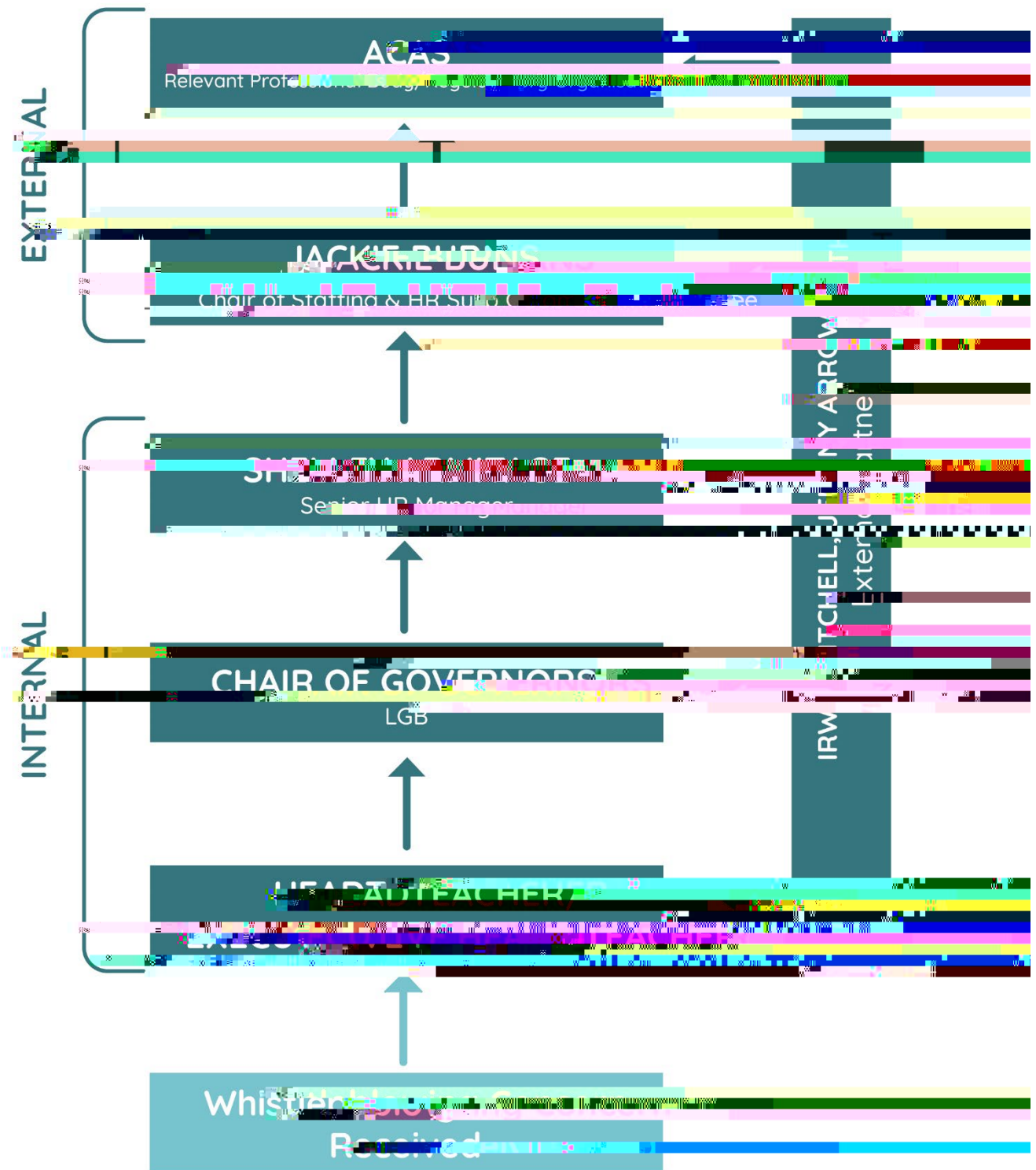
See Appendix D for contact details.

Finance



See Appendix D for contact details.

HR



See Appendix D for contact details.

APPENDIX D

Key Contacts

SECONDARY HEADTEACHERS

Clifton Community School – Anna Leng:

