Whistleblowing Policy

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Shaw Education Trust

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Introduction

Shaw Education Trust (SET) is committed to the highest standards of openness, probity and accountability; and to safeguarding the public resources for which it is responsible. We expect all staff and representatives to operate honestly and with integrity. Fraud and corruption, misconduct, waste or wrongdoing will not be tolerated. As with all SET policies, the principles covered within this document will be achieved through our values of opportunity, integrity, community and equity, ensuring fair treatment for all those involved.

This policy sets out the Trust's approach to Whistleblowing and confirms its commitment to conduct all matters with honesty and integrity. As part of this commitment, we expect all staff to maintain high standards of conduct in accordance with their contracts of employment and/or our workplace policies. 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.

The policy and procedure apply to all colleagues, regardless of length of service, but does not form part of the contract of employment and can be varied from time to time. This policy has been equality impact assessed and we believe is in line with the Equality Act 2010. It does not have an adverse effect on race, gender or disability equality.

Scope and Purpose of policy

The purpose of this policy is to:

(f) 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.

(f) provide staff with guidance as to how to raise those concerns.

(f) reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.

Definitions

In this Whistleblowing Policy, unless the context otherwise requires, the following expressions shall have the following meanings:

(i) 'Academy' means any academy operated by Shaw Education Trust and includes all sites upon which the Academy undertaking is, from time to time, being carried out.

(ii) 'Board' means the board of Trustees.

(iii) 'Companion' means a willing work colleague, or a trade union official, an accredited representative of a trade union or other professional association of which the employee is a member, who should be available for the periods of time necessary to meet the timescales under this Whistleblowing Policy.

(iv) 'Headteacher' means the most senior teacher in the Academy who is responsible for its management and administration. Such teacher may also be referred to as the Head of School, Executive Headteacher or Principal.

(v) 'Trust' means Shaw Education Trust, which is the company responsible for the management of the Academy and Central team, for all purposes, means the employer of staff at the Academy or Central team.

(vi) 'Working Day' means any day on which you would ordinarily work if you were a full-time employee. In other words, 'Working Day' may apply differently to teaching and non-teaching staff. However, part-time and full-time staff will not be treated differently for the purposes of implementing this Whistleblowing Policy.

What is whistleblowing

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) damage to the environment;

(f) bribery under our SET Anti-Fraud and Corruption policy

(g) financial fraud or mismanagement;

(h) breach of relevant Trust and/or local Academy policies and procedures, including but not limited to the Disciplinary Policy and Procedure;

(i) conduct likely to damage the Trust's and/or Academy's reputation;

(j) conduct likely to damage the Trust and/or Academy's financial wellbeing;

(k) unauthorised disclosure of confidential information;

(l) negligence;

(m) malpractice;

(n) the deliberate concealment of any of the above matters.

A whistleblower is a colleague who has a reasonable belief that wrongdoing has or may have occurred, and 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.

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 refer to the SET Grievance Policy.

If you are uncertain whether something is within the scope of this policy, you should seek advice from either the Chief People Officer or the Senior Director of Governance (SET Whistleblowing Officers).

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager or, where that is not appropriate, the Headteacher of your school or one of the Chief Officers within the Central team.

Where the Headteacher has a whistleblowing concern, they should raise it with the Chief Officer who is responsible for the function the concern is being raised about. 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 another Chief Officer colleague on your behalf.

However, where the matter is more serious, or you feel that your line manager, or where appropriate, the Headteacher/Chief Officer has not addressed your concern, or you



prefer not to raise it with them for any reason, you should contact one of the SET Whistleblowing Officers as following:

(a) Chief People Officer

(b) Senior Director of Governance

*see appendix 1 for contact details.

In such cases we will;

- arrange a meeting with you as soon as possible to discuss your concern. You may bring a companion 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

In the event that your concern is relating to one of the Whistleblowing Officers, please contact the second Whistleblowing Officer. In the event that your concern is relating to the Chief Executive Officer, the Whistleblowing Officer will liaise directly with the Chair of the Audit and Risk Committee.

Confidentiality

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.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer(s) and appropriate measures can then be taken to preserve confidentiality. If you feel you have no option but to remain anonymous, please address your concern in writing to the Whistleblowing Officer and this will be passed to either Officer (see appendix for contact details).

Please note however, that where possible we do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible with anonymous concerns as we cannot obtain further information from you, and it may be more difficult to establish whether allegations are credible. In these circumstances, reasonable measures will be taken to substantiate whether enough credible information has been

provided to enable the Whistleblowing Officers to take your concerns forward for investigation, or whether the submission will be noted and recorded.

If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy (see appendix 1).

Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. Whilst we are investigating, we will seek to keep details of such a process to the minimum number of people, however there may be instances where the Executive Leadership Team and/or the Board are required to be notified of both an open investigation and any outcomes.

We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

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.

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.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

If you are not satisfied

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.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts (see appendix 1).



Companion

You may be accompanied by a companion at any meeting held under this policy.

You must let the relevant person arranging the meeting know who your companion will be at least one working day before the relevant meeting.

If you have any reasonable need, for example, because you have a disability, you can also be accompanied by a suitable helper.

Your Companion can address the meeting in order to:

(a) put forward your concerns;

(b) respond on your behalf to any view expressed at the meeting; and

(c) ask questions on your behalf.

Your Companion can also confer with you during the meeting.

Your Companion has no right to:

(d) answer questions on your behalf;

(e) address the meeting if you do not wish it; or

(f) prevent you from explaining your concerns.

Where you have identified your Companion and they have confirmed in writing to the relevant person arranging the meeting under this policy that they cannot attend the date or time set for the meeting, the relevant meeting will be postponed for a period not in excess of five Working Days from the date set by the Trust to a date and time agreed with your Companion

Should you or your Companion subsequently be unable to attend the rearranged Meeting, it may be held in your/their absence or written representations will be accepted.

External disclosures

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.

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, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details can be found in the appendix 1 of this policy.

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, contractor 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 the Headteacher, or where you are the Headteacher, the relevant Chief Officer, or one of the other individuals set out in the appendix 1.

Protection and support for whistleblowers

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.

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 the Whistleblowing Officer(s) immediately. If the matter is not remedied, you should raise it formally using the SET Grievance Policy.

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.

Appendix 1 – Key contacts

Whistleblowing Officers	Beth Barlow 01782 948259 Beth.barlow@shaw-education.org.uk or whilstleblowing@shaw-education.org.uk Kidsgrove Secondary School, Gloucester Road, Kidsgrove, ST7 4DL
Whistleblowing Officers	Becky Beaty 07483 552109 becky.beaty@shaw-education.org.uk or whistleblowing@shaw-education.org.uk Kidsgrove Secondary School, Gloucester Road, Kidsgrove, ST7 4DL
Chief Executive Officer	Kerry Inscker 01782 948259 kerry.inscker@shaw-education.org.uk Kidsgrove Secondary School, Gloucester Road, Kidsgrove, ST7 4DL
Chair of Audit and Risk Committee	Helen Walker whistleblowing@shaw-education.org.uk Kidsgrove Secondary School, Gloucester Road, Kidsgrove, ST7 4DL
Trust's external auditors	Crowe UK LLP +44 (0)20 7842 7262 Website: Audit | Crowe UK
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk



Working together to inspire communities where every school is valued, every voice matters and every learner thrives.

Shaw Education Trust

Shaw Education Trust Head Office,
Kidsgrove Secondary School, Gloucester Road,
Kidsgrove, ST7 4DL

Email: info@shaw-education.org.uk
Call: 01782 948259
Visit: shaw-education.org.uk
LinkedIn: @ShawEducationTrust