

Whistleblowing Policy and Procedure

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Honesty and integrity

The Trust is committed to conducting its business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the [Code of Conduct](#). 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.

Aims

The aims of this policy are 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
- Provide staff with guidance as to how to raise those concerns
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied with the action taken
- 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, Local Academy Board members, consultants, contractors, volunteers, work placement students, casual workers and agency workers.

Wrongdoing at work

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

- Criminal activity
- Safeguarding concerns (see [Safeguarding](#) below)
- Failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice
- Danger to health and safety

- Damage to the environment
- Bribery;
- Financial fraud or mismanagement
- Other unlawful or unethical conduct in the workplace
- The deliberate concealment of any of the above matters

Whistleblower: 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 (and such a concern is in the public interest) (a **whistleblowing concern**) you should report it under this policy.

Grievances: This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The **Grievance Policy and Procedure** should be used in such cases.

Detriment: Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing.

Advice: If you are uncertain whether something is within the scope of this policy you should seek advice from the Head, the DSL, Public Concern at Work, the NSPCC whistleblowing helpline, or your Trade Union.

Safeguarding

Safeguarding: Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with *Keeping Children Safe in Education* (DfE, September 2023 or as amended). In particular:

Safeguarding/child protection policy: If you have any concerns about a pupil's welfare, action should be taken immediately (even if they are low level concerns). You should report the concern to the DSL or the Deputy DSL. See the Academies' child protection and safeguarding policy and procedures for full information about what to do if you have a concern about a pupil, including what to do if the DSL is not available.

Safeguarding - member of staff: You should raise any concerns about another staff member (even if they are low level concerns) with the Head, or if the concern is about the Head, with the Chair of the Local Academy Board or a Trust senior manager (without first notifying the Head) in accordance with the procedures in the Trust's child protection and safeguarding policy and procedures.

Whistleblowing policy: You should follow this procedure to raise concerns about poor or unsafe safeguarding practices within the Trust or potential failures by the Trust or Academy or staff to properly fulfil their safeguarding responsibilities.

Referral: If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately. Anyone can make a referral.

The Modern Slavery helpline: The Trust is committed to the prevention of modern slavery. If you have any queries relating to modern slavery, please contact the Head. Identified instances of modern slavery should be immediately notified to the police. If you think you have identified an instance of modern slavery, or if you consider that you may be a victim of modern slavery you may contact the Modern Slavery helpline on 0800 0121 700 (www.modernslaveryhelpline.org).

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.

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.

Procedure

Stage	Procedure	Response
One	You should disclose the suspected wrongdoing first to the Head, or your line manager if you are not based in a school. In the event that the Head, line manager or CEO is involved in the suspected wrongdoing, you should proceed directly to Stage Two	You can expect a response detailing any action taken within seven calendar days of the relevant individual becoming aware of the disclosure
Two	If no response is forthcoming after seven calendar days from the Head or line manager, or if you are not satisfied with the way in which your concern has been handled, or if the Head/line manager is involved in the suspected wrongdoing, you should notify the Chair of the Local Academy Board or a Trust Senior Manager, as appropriate If the CEO is involved, you should disclose the suspected wrongdoing to Martha Burnige, Chair of the Trustees, on mburnige@pansophiclearning.com .	
Three	If no such response is forthcoming after seven calendar days from the Trust Senior Manager, if you are not satisfied with the way in which your concern has been handled or if the Trust Senior Manager is involved in the suspected wrongdoing, you should inform the CEO of the disclosure	

If you wish, you may also disclose the suspected wrongdoing to Martha Burnige, Chair of the Trustees, on mburnige@pansophiclearning.com.

Procedure for responding to a whistleblowing concern

When a concern is received by the Head, line manager, Trust Senior Manager or Trustee (referred to from hereon as the 'recipient'), they will:

- Meet with you within a reasonable time. You may be joined by a trade union representative
- Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken
- Establish whether there is sufficient cause for concern to warrant further investigation. If so:
 - The recipient should will arrange a further investigation into the matter
 - In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police

- You should be informed of how the matter is being investigated and an estimated timeframe for when you will be informed of the next steps

Once the investigation is complete, the investigator will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether or not a referral is required to an external organisation, such as the local authority or police. They will inform you of the outcome of the investigation, though certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the Trust Senior Central Team, in conjunction with Trustees, LAB members, Head(s) and other staff, if necessary and appropriate, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern. If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

Relevant external reporting

Outside body: The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for you to report your concerns to a relevant outside body including:

- The local authority's Designated Officer
- Children's Social Care
- The NSPCC
- The Health and Safety Executive
- The Environment Agency
- The Information Commissioner
- The Department for Education
- The Department for Business, Energy and Industrial Strategy
- The Police
- The Charity Commission
- The Independent Schools Inspectorate
- The Office for Standards in Education, Children's Services and Skills (**Ofsted**)
- The Channel Police Practitioner

Advice: Staff are strongly encouraged to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from:

- Protect (formerly known as Public Concern at Work): If you have any concerns about disclosing a suspected wrongdoing the independent whistleblowing charity, Protect, operates a confidential helpline. <https://protect-advice.org.uk/advice-line/>.
- NSPCC: The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8.00 am to 8.00 pm Monday to Friday) or email help@nspcc.org.uk.
- Your Trade Union

The media: You should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and/or where your concern is disclosed in a malicious manner or for personal gain the protection given to you by this procedure may be lost. Additionally, the Trust may consider this to be gross misconduct and disciplinary action may be taken against you.

Queries: If you have any queries about this procedure, you should contact:

- The Head, if you are based in a school
- The Director of Education, if you are a Head
- The relevant Director, if you are based in the Central Team
- The CEO if you are a Director in the Senior Central Team