

The Corsham School Academy Group Whistle-Blowing Policy Part of the Personnel Policies

Policy Agreed (date)	October 2022
Next Review date	October 2023

1.0 Introduction

The Public Interest Disclosure Act 1998 was enacted to ensure a climate of greater frankness between employers and workers so that irregularities can be identified and addressed quickly, and to strengthen employment rights by protecting responsible workers who blow the whistle about wrongdoing or failures in the workplace. The policy set out in this document applies those statutory provisions to the administration of the Trust and its academies.

This Policy also applies to the Trust’s Board Members, Governors, management and all staff.

Employees are often the first to realise that something seriously wrong may be happening within the Trust or one of its academies. However, they may not express their concerns either because they feel that speaking up would be disloyal to their colleagues or to their employer or because they fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern than to report what may just be a suspicion of malpractice.

The Corsham School Academy Group is committed to the highest possible standards of openness, probity and accountability. In line with that commitment it encourages employees and others with serious concerns about any aspect of the work of the Trust or one of its academies to come forward and voice those concerns. It recognises that certain cases will have to proceed on a confidential basis. This policy makes it clear that staff can do so without fear of reprisals and is intended to encourage and enable staff to raise serious concerns within the Trust or an academy, rather than overlooking a problem or publicly disclosing the matter.

2.0 Aims and scope of this policy

This policy aims to:

- Provide avenues for you to raise concerns and receive feedback on any action taken;
- Allow you to take the matter further if you are dissatisfied with the response of the Trust / academy;

This policy covers concerns that fall outside the scope of other procedures. It is not intended as recourse against financial or business decisions made by the Trust / academy. Nor is it an alternative to well-established disciplinary or grievance procedures, which should be used to address concerns regarding individual employment matters. It may however overlap with other policies for dealing with complaints, and with protocols for good working relationships within the Trust / academy.

Concerns raised under this Whistle-blowing Policy should be about something that is, in the reasonable belief of the employee, made in the public interest, and may be;

- A criminal offence
- The breach of a legal obligation

- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above

3.1 Safeguards

3.1 Harassment or Victimisation

The Trust recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Trust will take action to protect you when you raise a concern. It will not tolerate any resulting harassment or victimisation (including informal or indirect pressures) and will treat this as a serious disciplinary offence which will be dealt with under the proper procedures.

All parties should note that Whistleblowers are protected, by law, from suffering a detriment, bullying or harassment from another employee.

Any investigation into an allegation of malpractice will not influence or be influenced by any disciplinary or redundancy procedures which already affect you.

3.2 Confidentiality

All concerns will be treated in confidence and the Trust will do its best to protect your identity if you do not want your name to be disclosed. If investigation of a concern discloses a situation which is sufficiently serious to warrant disciplinary action or police involvement then your evidence may be important. Your name will not however be released as a possible witness until the reasons for its disclosure at this stage have been fully discussed with you.

3.3 Anonymous allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful but they will be considered.

You should also bear in mind that if you do choose to raise a concern anonymously it will be more difficult for the matter to be investigated and for you to be provided with feedback. For this reason, where you wish to raise your concern anonymously, this may best be done through your trade union.

3.4 Untrue allegations

If you make an allegation which is not confirmed by the investigation, no action will be taken against you unless it is considered that you have made malicious or vexatious allegations. In these circumstances, disciplinary action may be taken against you.

4.0 How to raise a concern

Staff should in the first instance raise a concern with their line manager, or another manager within their academy. The manager will report the concern to the Headteacher. However, if for some reason this first step is inappropriate then the concern should be raised with one of the following Designated Contacts or, if the concern relates to the Headteacher, to the Chair of Governors of The Corsham School or Corsham Regis (as relevant):

- Corsham Regis –
Mr Alan Brown – Local Governor
Mrs Angelica Hunt, staff member
- The Corsham School -
Mr Paul Rooke – Governor and Director/Trustee
Mrs Charlotte Derham, CTL Drama
Mrs Rebecca Richards, Lead Teacher Science
Mrs Mary Macey-Brown, Headteacher & Deputy Headteacher PA

Concerns can be raised orally but it is good practice for the concern to be recorded in writing at an early stage to ensure that all the details are correctly understood. A written allegation should set out the background and history of the concern (giving names, dates and places where possible) and the reason why you are particularly concerned about the situation. It is preferable for you to record this in writing yourself. However, where the person to whom you voice your concerns writes these down, a copy will be sent to your home address or via your representative to give you an opportunity to agree this as a correct record.

The earlier you express the concern, the easier it is to take action.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

You may of course wish to seek advice from your trade union representative on how best to raise your concern.

5.0 How the Trust will respond

The action taken by the Designated Contact will depend on the nature of the concern. After initial enquiries to assess the seriousness of the matter it may be investigated internally (employing specific procedures where these are applicable – for example in child protection or discrimination issues), or by an independent investigating officer appointed by the Designated Contact.

If urgent action is required in response to a concern this may well be taken before a full investigation is conducted.

In any event within ten working days of a concern being received, the Designated Contact will write to you at your home address:

- Acknowledging that the concern has been received
- Indicating how it proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling you whether any initial enquiries have been made
- Telling you whether further investigations will take place, and if not, why not
- Telling you the name of the person or agency who has been appointed by the Trust to investigate the matter
- Naming an independent person to support you during any investigation e.g. your trade union official. This named person will make contact with you immediately, explain his/her role, deal with all confidentiality issues, agree frequency of contact and keep you informed about the progress of the investigation and the investigating officer informed of any further issues you think are necessary. You should raise with this support officer any concerns you have about the conduct of the investigation. This officer will take appropriate steps to support you in the workplace and at any criminal or disciplinary proceedings which may eventually result from your concern and at which you are asked to give evidence.

If you wish to retain your anonymity you will need to nominate a representative to whom correspondence may be directed in order to keep you informed.

The amount of contact between the investigating officer and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

When any meeting is arranged, you have the right, if you so wish, to be accompanied by a trade union or professional association representative or a work colleague.

The Trust accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcome of any investigations and/or proceedings.

6.0 How the matter can be taken further

This policy is intended to provide you with a way to raise concerns within the Trust and / or one of its academies. The Trust hopes you will be satisfied by its response. If you are not, you may wish to raise the matter with your trade union official, who in return will liaise with the Trust on your behalf.

7.0 Monitoring, Evaluation and Review

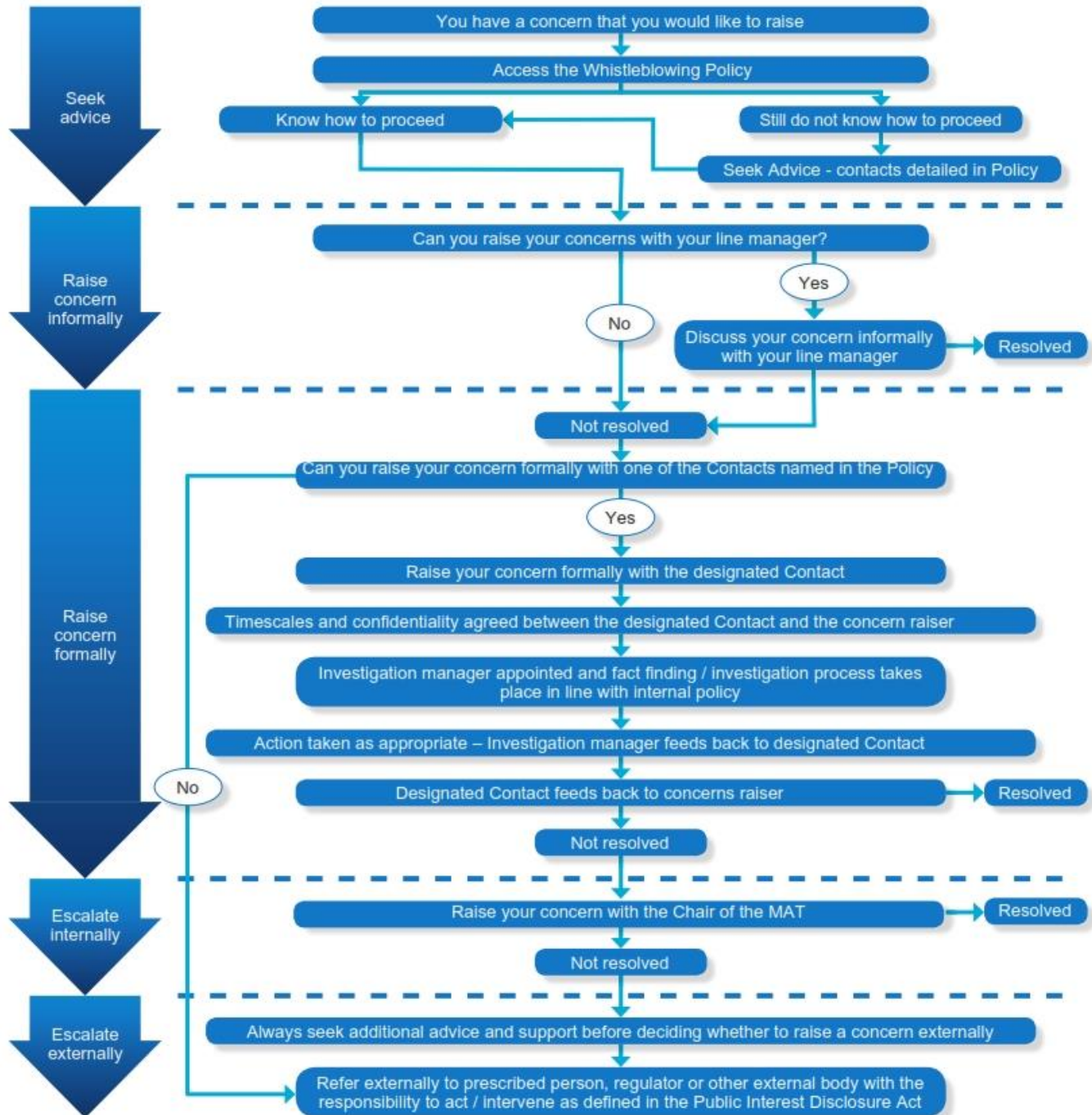
The Corsham School Academy Group Trust has overall responsibility for the maintenance and operation of this policy. The Trust will maintain a record of all concerns raised under this policy and the outcomes of any investigations.

Date of policy last review: October 2022

Date of next review: October 2023

Flowchart for raising concerns/Whistleblowing

*You should seek to highlight your concern within your organisation informally where possible. Advice and support is available throughout this process. You can contact your trade union, HR, professional regulator, professional body or, alternatively, independent advice can be sought through the National Whistleblowing Helpline on 0800 072 4725



Raising a public interest (whistleblowing) concern.
 A public interest concern may include where:

- someone's health and / or safety has been put in danger because of an action or inaction;
- damage has been caused to the environment;
- a criminal offence has been committed;
- an employer fails to obey the law (such as not having appropriate insurance);
- a malpractice or wrong-doing has been covered up.