

Whistleblowing Policy

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Jesus grew in wisdom and stature

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"Growing together at the heart of God's community"



Trust Prayer

We thank you, God of Love, for the gift of children,
bless the work of our Trust, that in all we do
young people may grow in wisdom and stature,
and so come
to know you,
to love you
and to serve you
as Jesus did.

We make our prayer in his name who is God
with you and the Holy Spirit, now and forever.

Amen

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1. Our Mission

- 1.1. To create a Trust in which our schools will thrive under the leadership of Head Teachers, supported and challenged by local governing bodies and accountable to the board of trustees.
- 1.2. We will achieve this by living our values of:
 - Collaboration
 - Valuing the Local
 - Valuing Difference
 - Inclusion
- 1.3. We want to ensure that all our children to flourish and reach their full potential, within the explicit Christian culture of our schools.

2. Introduction

- 2.1. We are committed to the highest possible standards of honesty and integrity and we expect all staff to reflect these standards. A culture of openness and accountability is essential in order to achieve these standards. There may be, however, times when there is unethical, negligent, or illegal conduct taking place without knowledge of Liverpool Diocesan Schools Trust (LDST).
- 2.2. This policy provides the basis on which this type of unacceptable conduct can be reported and be addressed.

2.3 Employees are often the first to realise that there may be something seriously wrong within the school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues, or to the school. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be suspicion of malpractice. The Governing Body is committed to the highest possible standards of openness, honesty and accountability. In line with this commitment, the Governing Body would wish to encourage employees and others with serious concerns about any aspect of the school's work, to come forward and voice those concerns. This includes any issues relating to gender and race, whereby a person may suspect discrimination is occurring. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage and is intended to encourage and enable employees to raise serious concerns within the school, rather than overlooking a problem or 'blowing the whistle' outside.

3. Scope

- 3.1. 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

- Reassure staff that they should be able to raise genuine concerns in the public interest without fear of victimisation, subsequent discrimination or disadvantage, even if they turn out to be mistaken.
- 3.2. This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.
- 3.3. This policy applies to all individuals working at all levels of the organisation; governors, directors, employees, consultants, contractors, trainees, homeworkers, part-time workers, fixed-term workers, volunteers, casual workers, agency staff (collectively referred to as staff in this policy).

4. Definitions

- 4.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include, but is not limited to:
- Criminal activity
 - Miscarriages of justice
 - Danger to health and safety
 - Damage to the environment
 - Failure to comply with any legal or professional obligation regulatory requirements
 - Bribery
 - Financial fraud or mismanagement
 - Negligence
 - Breach of our internal policies and procedures
 - Conduct likely to damage our reputation
 - Unauthorised disclosure of confidential information
 - The deliberate concealment of any of the above matters.
- 4.2. A whistle-blower is a person who raises a genuine concern in the public interest 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.
- 4.3. 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 LDST Grievance Policy.
- 4.4. If staff are unsure whether something is within scope of this policy, you should seek advice from Human Resources.

5. Raising a Whistleblowing Concern

- 5.1. In the majority of cases where staff have a concern it would be appropriate to raise this with their line manager. Staff may tell them in person or put the matter in writing if they prefer. Where a line manager is verbally informed they will share a written note of the conversation with the employee. They may be able to agree a way of resolving the staff members concern quickly and effectively.

- 5.2. The line manager may refer the matter to the Headteacher, Chair of Governors or a member of the LDST Executive Team if they consider it appropriate and proportionate.
- 5.3. However, there be situations where staff do not feel it is appropriate to approach their line manager. Examples include, but are not limited to; where staff consider the matter too serious, or where their line manager has not addressed their concern.
- 5.4. If a situation in accordance with 5.3 arises then staff should raise their concern with one of the following, contacts for whom can be found in Appendix 1:
- Deputy Headteacher
 - Headteacher
 - The Chair of Governors
 - The Trust Education Officer
 - The Chief Executive Officer
- 5.5. A meeting will be raised with the whistle-blower as soon as reasonably possibly to discuss your concern.
- 5.6. The whistle-blower may bring a colleague or union representative to any meeting conducted under this policy. Any companion or representative must respect the confidentiality of the disclosure and any subsequent investigation.
- 5.7. A written summary of the whistle-blowers concern will be made at the meeting and they will be provided with a copy after the meeting. An indication of how it is proposed to deal with the matter will also be provided.

6. Confidentiality

- 6.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy.
- 6.2. If you want to raise your concern confidentially we will make every effort to keep your identity secret. If it is necessary for anyone investigation your concern to know your identity, we will discuss this with you.
- 6.3. There may be situations where despite all reasonable efforts, it is not possible to keep the whistle-blowers identity secret. For example, where the subject of a whistleblowing concern can deduce an identity from who witnesses/was aware of the reported incident.
- 6.4. 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 and have been made in the public interest. Therefore, LDST does not encourage staff to make disclosures anonymously.
- 6.5. Anonymous complaints will be investigated as far as reasonably possible.

- 6.6. Whistle blowers who are concerned about possible reprisals (be it victimisation, discrimination or disadvantage) if their identity is revealed should come forward to the Head Teacher, Trust Education Officer or one of the other contact points. Reasonable measures can then be taken to preserve confidentiality.
- 6.7. If a criminal offence has occurred, we may be required to report the matter to the relevant authorities. If such a situation concerns we will discuss with you how we can protect you.
- 6.8. If you are in any doubt you can seek advice from [Public Concern at Work](#) who operate a confidential helpline – 020 7404 6609, or from your trade union representative.

7. External Disclosures

- 7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying and wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.
- 7.2. The law recognises that in some cases it may be appropriate for your to report your concerns to an external body, such as a regulator.
- 7.3. It will rarely, if ever, be appropriate to alert the media.
- 7.4. We strongly encourage staff to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, [Public Concern at Work](#), operates a confidential helpline – 020 7404 6609. They also have a list of prescribed regulators for reporting certain types of concern. Staff may also seek advice from their trade union representative.
- 7.5. A list of prescribed regulators is also available from the governments website by accessing this [link](#).
- 7.6. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. Examples include, but are not limited to; a supplier, a service provider, or a contractor.
- 7.7. The law allows you to raise a concern in the public interest with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage staff to report such concerns internally first.

8. Investigation and Outcome

- 8.1. Once the whistle-blower has raised a concern an initial assessment will be undertaken to determine the scope of any investigation.
- 8.2. LDST cannot guarantee the outcome the whistle-blower initially seeks will be achieved. However, we are committed to dealing with all concerns fairly and reasonably. Engaging with this policy will support LDST in achieving this.
- 8.3. The whistle-blower will be informed of the outcome of the assessment.

- 8.4. The whistle-blower may be required to attend additional meetings in order to provide further information. In some cases, an investigator, or team of investigators may be appointed. Examples of where this may be appropriate include, but are not limited to; where relevant experience of investigations is required, or where specialist knowledge of the subject matter is required.
- 8.5. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing. Recommendations may also be made for further action in accordance with the LDST Disciplinary Policy.
- 8.6. The person the whistle-blower raised their concern with will aim to keep the whistle-blower informed of the progress of the investigation and its likely timescale.
- 8.7. Any information shared with the whistle-blower must be treated as confidential.
- 8.8. The need for confidentiality may prevent giving the whistle-blower specific details of the investigation or any disciplinary action taken as a result.
- 8.9. If it is concluded that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to investigation and a disciplinary penalty in accordance with the LDST Disciplinary Policy.
- 8.10. If the whistle-blower is not happy with the way in which their concern has been handled, they may contact; the Trust Education Officer, The Chief Executive Officer, or the LDST Board of Directors.

9. Protection and Support for Whistle-Blowers

- 9.1. LDST recognises and understands that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in the public interest under this policy, even if they turn out to be mistaken.
- 9.2. Staff will not suffer any detrimental treatment as a result of raising a concern in the public interest.
- 9.3. Detrimental treatment includes, but is not limited to; dismissal, disciplinary action, threats, unfavourable treatment from the employer or co-workers connected with raising the concern.
- 9.4. If a whistle-blower feels they have suffered any detrimental treatment they should inform the Headteacher or HR Director immediately. Staff may also see advice and support from their trade union representative.

10. Responsibility for the Success of this Policy

- 10.1. The LDST Board of Directors has overall responsibility for this policy. Including legally and operationally, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

- 10.2. The Headteacher (Trust Education Officer for Head Office) has day to day operational responsibility for this policy, and must ensure all appropriate staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
 - 10.3. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.
 - 10.4. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR Director or the LDST Board of Directors.
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Appendix 1 – Contacts

Name of school	Glazebury CE Primary School
Head Teacher	Name: Karen Mowbray Telephone 01925 763234 E-Mail: Glazeburyprimary.head@ldst.org.uk Address: Warrington Road, Glazebury, Warrington. Cheshire WA3 5LZ
Deputy Head Teacher	Name: Karen Wall Telephone 01925 763234 E-Mail: glazeburyprimary@ldst.org.uk Address: Warrington Road, Glazebury, Warrington. Cheshire WA3 5LZ
Chair of Governors	Name: Stuart Roberts-Tighe Telephone 01925 763234 E-Mail: Glazeburyprimary.head@ldst.org.uk Address: C/O :Warrington Road, Glazebury, Warrington. Cheshire WA3 5LZ
HR Director	Name: Warrington HR services Telephone: 01925 443446 E-Mail: blogan@warrington.gov.uk Address: HR Business Partner, Human Resources Advisory Service, Corporate Services Directorate, Warrington Borough Council, 4 th floor, Quattro Building, Warrington, WA1 2NJ
Trust Education Officer	Name: Laurie Kwissa Telephone: 0151 705 2102 Email: laurie.kwissa@liverpool.anglican.org Address: St James House, 20 St James St Liverpool L1 7BY
Chief Executive Officer	Name: Laurie Kwissa Telephone: 0151 705 2102 Email: laurie.kwissa@liverpool.anglican.org Address: St James House, 20 St James St Liverpool L1 7BY
Chair of the board of Directors	Name: Canon Dr Jon Richardson Email: ldst@liverpool.anglican.org Address: C/O:St James House, 20 St James St Liverpool L1 7BY
Public concern at work (Independent Whistleblowing Charity)	Helpline: 0207 4046609 Email: whistle@pcaw.co.uk Website: www.pcaw.co.uk

Appendix 2:

Safeguards against Harassment or Victimisation

The Governing Body is committed to good practice and high standards and wants to be supportive of employees.

The Governing Body recognises that the decision to report a concern may be a difficult one to make, not least because of fear of reprisal from those responsible for the malpractice. The Governing Body will not tolerate harassment or victimisation and will take action to protect employees when they raise a concern in good faith. This does not mean that if employees are already subject to disciplinary or redundancy procedures, that those procedures will be halted as a result of whistle-blowing.

Confidentiality

The Governing Body will do its best to protect an employee's identity when he/she raises a concern and does not want his/her name to be disclosed.

It must be appreciated that the investigation process may reveal the source of the information and a statement by the employee may be required as part of the evidence.

Anonymous allegations

This policy encourages an employee to put his/her name to an allegation. Concerns expressed anonymously are much less capable of being actioned effectively, but they will be considered at the discretion of the Governing Body.

In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If an employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against him/her.

If an employee makes malicious or troublesome allegations, disciplinary action will be taken against him/her.

How to raise a concern

This will depend on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice.

Concerns should be raised with one of the following:

- The Head Teacher
- The Chair of Governors (if the concern is about the Head Teacher)

Concerns are better raised in writing. Employees are invited to set out the background and history of the concern, giving names, dates, and places where possible, and the reason why they are particularly concerned about the situation. However verbal approaches will be considered.

The earlier a concern is expressed, the easier it is to take action.

Although employees are not expected to prove beyond doubt the truth of the allegation, they will need to demonstrate that there are reasonable grounds for their concerns.

Advice and guidance on how matters of concern may be pursued can be obtained from:

- The Head Teacher or Chair of Governors
- Trade Union or Professional Association

Employees may invite their trade union or professional representative to raise the matter on their behalf.

How the Governing Body will respond

The action taken by the Governing Body will depend on the nature of the concern.

The matters raised may be investigated internally.

In order to protect individuals and the Governing Body, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of

specific procedures (for example child protection, criminal or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within **ten working days** of a concern being received, the Head Teacher or Chair of Governors will write to the employee raising the concern:

- Acknowledging that the concern has been received
- Indicating how it is proposed to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling the employee whether any initial enquiries have been made
- Telling the employee whether further investigations will take place and, if not, why not.

The amount of contact between those considering the issues and the employee raising the concerns 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.

When any meeting is arranged, the employee will have the right, if they so wish, to be accompanied by a representative of their trade union or professional association, or a friend who is not involved in the area of work to which the concern relates.

The Governing Body will take steps to minimise any difficulties which the employee may experience as a result of raising the concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Governing Body will advise about procedures.

The Responsible Officer

The Head Teacher has overall responsibility for the maintenance and operation of this policy on a day to day basis. Please see pt.10.2. A record of concerns raised and the outcomes (but in a form which does not endanger the employee's confidentiality) will be maintained and will be reported, as necessary, to the Governing Body.

The Governing Body accepts that employees will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the employee will receive information about the outcomes of any investigation.

At all times, all parties involved will be treated with respect and maintain the highest standards of professional conduct. Misconduct arising from any investigations will result in separate action being taken on the conclusion of the initial investigation.