Whistle Blowing Policy

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Updates and amendments

Date	Policy section	What's changed?	Why?
June 2024	How to Raise a Concern (Page 9)	Chair of Audit & Risk Committee details added	Audit recommendation

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1. Aim

To provide clear guidelines on the position of Forward As One Church of England Multi Academy Trust in relation to Whistleblowing.

2. Objectives

a.) To provide avenues for you to raise concerns and receive feedback on any action taken.

b.) Allows you to take the matter further if you are dissatisfied with the Forward As One Church of England Multi Academy Trust's response.

c.) Reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith.

3. Context

The Trust Board of Forward As One Church of England Multi Academy Trust is committed to the highest standards of openness, probity and accountability. In line with that commitment, we encourage employees who have serious concerns about any aspect of the Forward As One Church of England Multi Academy Trust to come forward and voice those concerns.

4. Legal Position

The policy provides a means for you to raise a concern under the Public Interest Disclosure Act 1998, which provides you with a certain level of legal protection if you wish to raise legitimate concerns.

5. Definitions, Roles, Responsibilities and Procedures

Appendix A provides detailed guidance on Forward As One Church of England Multi Academy Trust Whistleblowing Policy including:

a.) Introduction
b.) Aims and Scopes of the Policy
c.) Safeguards
d.) How to Raise a Concern

e.) How the Forward As One Church of England Multi Academy Trust will respond
f.) How the matter can be taken further

Appendix B provides a procedural flowchart.

6. Evaluation

This policy will be evaluated annually by the Trust Board to ensure it is still fit for purpose. Circumstances may require more frequent modifications.

Appendix A: Whistleblowing Policy

Introduction

As an employee or a governor you are often the first to realise that there may be something seriously wrong within the Forward As One Church of England Multi Academy Trust. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or Forward As One Church of England Multi Academy Trust. You may also fear harassment or victimisation, and think it may be easier to ignore the concern rather than report it.

Forward As One Church of England Multi Academy Trust is committed to the highest standards of openness, probity and accountability. In line with that commitment, we encourage employees and governors, who have serious concerns about any aspect of Forward As One Church of England Multi Academy Trust, to come forward and voice those concerns.

It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that staff can do so without fear of reprisals. This Whistleblowing Policy is intended to encourage and enable staff and governors, to raise serious concerns with Forward As One Church of England Multi Academy Trust rather than overlooking a problem or discussing it externally. In addition, the policy provides a means for you to raise a concern under the Public Interest Disclosure Act 1998, which provides you with a certain level of legal protection if you wish to raise legitimate concerns.

The Executive Headteacher has overall responsibility for:

a.) maintaining and operating the policy
b.) annual report on the effectiveness of the policy
c.) approving amendments to the policy
d.) promoting the policy periodically
e.) maintaining a record of concerns raised and the outcomes (but in a form that does not endanger your confidentiality) and will report as necessary to Forward As One Church of England Multi Academy Trust.

Aim and Scope of the Policy

The aim of this policy is to:

a.) provide avenues for you to raise concerns and receive feedback on any action taken
b.) allow you to take the matter further if you are dissatisfied with Forward As One Church of England Multi Academy Trust's response and
c.) reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith.

This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures, although Forward As One Church of England Multi Academy Trust reserves the right to determine which procedure is appropriate.

Concerns to be reported under this policy may relate to something that:

a.) is unlawful
b.) is against Forward As One Church of England Multi Academy Trust's Contract Procedure Rules
c.) Financial Procedure Rules or other policies
d.) falls below established standards or practice
e.) amounts to improper conduct

Safeguards

Harassment or Victimisation

The Forward As One Church of England Multi Academy 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.

Forward As One Church of England Multi Academy Trust will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith. This does not mean that if you are already the subject of procedures such as disciplinary, capability, grievance or managing attendance, that those procedures will be halted as a result of your whistleblowing. Where feasible, you will be contacted when your concern has been investigated to ascertain whether you have suffered any detriment as a result of your whistleblowing. If at any time, either

during or after the investigation, you feel that you have suffered any detriment as a result of your whistleblowing you should contact the Chair of the Trust Board.

Confidentiality

Forward As One Church of England Multi Academy Trust treats the details of all whistleblowers in confidence and will do its best not divulge your identity. However, it must be appreciated that the investigation process may reveal the source of the information without us revealing your identity directly, and a statement by you may be required as part of the evidence.

Anonymous Allegations

Allegations can be made anonymously. However, this policy encourages you to put your name to your allegation, as concerns expressed anonymously are often much more difficult to investigate. For example, we may need to contact you to obtain further information or verify the details you have already given us. Anonymous allegations will be considered wherever possible at the discretion of Forward As One Church of England Multi Academy Trust .

The factors to be taken into account when determining whether an investigation in such a case can proceed would include:

a.) the seriousness of the issues raised
b.) the creditability of the concern; and
c.) the likelihood of confirming the allegation from other, attributable sources

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, appropriate action may be taken against you.

How to Raise a Concern

The earlier you express the concern, the easier it is to take action. As a first step, you should normally raise concerns with your immediate manager or other appropriate manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should contact the Executive Headteacher or the Chair of the Audit & Risk Committee in writing (simma@fa1.uk) You may invite your trade union or professional association to raise a matter on your behalf.

How Forward As One Church of England Multi Academy Trust Will Respond

The action taken by Forward As One Church of England Multi Academy Trust will depend on the nature of the concern. The matters raised may:

a.) be investigated internally, (this is the most likely option)
b.) be referred to the Police
c.) be referred to the external auditor
d.) be referred to the DFE
e.) form the subject of an independent inquiry
f.) or any combination of the above

In order to protect individuals and Forward As One Church of England Multi Academy Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, child protection 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.

Within ten working days of a concern being received, where appropriate, Forward As One Church of England Multi Academy Trust will write to you:

a.) acknowledging that the concern has been received
b.) indicating how it proposes to deal with the matter
c.) telling you whether any initial enquiries have been made; and
d.) telling you whether further investigations will take place and, if not, why not.

The amount of contact between the employees or trustees considering the issues and yourself 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 wish, to be accompanied by a union or professional association representative or a friend who is not involved in the area of work to which the concern relates.

Forward As One Church of England Multi Academy Trust will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, Forward As One Church of England Multi Academy Trust will advise you about the procedure.

Forward As One Church of England Multi Academy Trust acknowledges the need to provide you with assurance that the matter has been properly addressed. Thus, subject to legal constraints, you will receive appropriate information about the extent and outcomes of any investigations.

How the Matter can be Taken Further

This policy is intended to provide you with an avenue to raise concerns within Forward As One Church of England Multi Academy Trust you will be satisfied. If you are not, and if you feel it is right to take the matter further, the following are possible contact points.

a.) Relevant professional bodies or regulatory Organisations
b.) DFE (Department for Education)
c.) Awarding Bodies
d.) Internal Audit acting on behalf of the Responsible Officer (Leeds City Council Financial Services to Schools)
e.) Forward As One Church of England Multi Academy Trust Solicitors – Browne Jacobson 0330 045 2112
f.) The Police
g.) Public Concern at Work (independent charity that provides free advice for employees who wish to express concerns about fraud or other serious malpractice)

If you do take the matter outside Forward As One Church of England Multi Academy Trust, you will need to ensure that you do not disclose confidential information or that disclosure would be privileged.

Appendix B: Whistleblowing Flowchart

