

Uffculme Academy Trust
Uffculme School and Uffculme Primary School

Whistleblowing Policy

September 2016

Approved by The Main Board on: 23rd September 2016

Next review date: September 2019

WHISTLEBLOWING POLICY

Introduction

The staff and directors of Uffculme Academy Trust seek to run all aspects of the trusts business and activity with full regard for high standards of conduct and integrity. In the event that members of trust staff, parents, governors or the school communities at large become aware of activities which give cause for concern, Uffculme Academy Trust has established the following whistleblowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially; and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Uffculme Academy Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Uffculme Academy Trust recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the trust.

Uffculme Academy Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

The policy applies to all Trust employees, Governors and Directors and those contractors working for the trust or on trust premises. It also covers suppliers and those providing services in the course of their work for the trust.

The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance and dissatisfaction which would be dealt with under the relevant grievance or complaints procedures.

The policy has been introduced to

- encourage employees to feel confident in raising serious concerns and to question and act upon concerns about practice.
- provide avenues for staff to raise those concerns and receive feedback on any action taken and ensure that any serious wrongdoing will be taken seriously
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure staff that they will be protected from possible reprisals or victimisation if they have reasonable belief that there is malpractice or impropriety and have made a disclosure in good faith

When might the whistleblowing policy apply?

The type of activity or behaviour which the Directors of Uffculme Academy Trust considers should be dealt with under this policy includes:

- lapses in the Child Protection provision
- manipulation of accounting records and finances
- inappropriate use of the trust's assets or funds
- decision-making for personal gain
- any criminal activity or disclosures related to miscarriages of justice
- abuse of position
- fraud, deceit, corruption or dishonesty
- serious breaches of procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- Health and Safety risks (risk to public or other employee)
- discrimination in employment or the provision of education
- any other matter the individual considers cannot be raised by any other means

How to raise a concern

Uffculme Academy Trust would encourage any matter to be raised internally in the first instance to allow those staff and directors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity. It is suggested that the first point of call be the individual's Line Manager. Some matters or concerns may be resolved by an agreed action without the need for a formal investigation.

Uffculme Academy Trust has designated a number of individuals to specifically deal with such matters and the individual(s) is/are invited to decide which of the following would be the most appropriate person to deal with the matter.

Executive Headteacher	heathl@uffculmeschool.net	01884 840458
HR Officer	battenl@uffculmeschool.net	01884 842939
Chair to the Directors (via Clerk, Mrs Sarah Buchanan)	buchanans@uffculmeschool.net	01884 840458

The individual may raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

In addition, information and advice can be obtained from the charity Public Concern at Work. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation. Contact details for the charity are as follows:

Whistleblowing Advice Line: 020 7404 6609 Email: whistle@pcaw.org.uk
Address: CAN Mezzanine, 7-14 Great Dover Street, London SE1 4YR

The individual may also seek help from their Trade Union representative, Citizens Advice Bureau or online at www.gov.uk/whistleblowing/how-to-blow-the-whistle

How will the matter be progressed?

If the matter cannot be resolved with the Line Manager, the individual(s) information or allegation will be passed to an Investigating Officer (IO) who will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The submitted document should be acknowledged in writing within 5 working days of receipt plus the individual should also be notified of who the IO will be and where possible, given an indication on how long the investigation may take. If the process takes longer than first anticipated, a 'progress' letter should be issued after 10 working days.

The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of the trust's staff, the trust's external auditors, legal or personnel advisors, the police, the Department for Education or Devon County Council. If there is third party involvement, it may be more difficult to predict the length of time for the investigation as it will be dependent upon evidence received.

Records will be kept of work undertaken, interviews and actions taken throughout the investigation. The IO will possibly need to work in conjunction with the Trust Directors and will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral such as the police.

The individual will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the Directors of the Trust.

If the individual is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the IO, the Trust board and/or directed to the Education Funding Agency (the organisation which regulates Academies).

Respecting confidentiality and protection

Wherever possible Uffculme Academy Trust seeks to respect the confidentiality and anonymity of the individual and will as far as possible protect him/her from reprisals. Uffculme Academy Trust will not tolerate any attempt to victimise the individual or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

The Public Interest Disclosure Act 1998 and the Enterprise & Regulatory Reform Act 2013 provides additional protection for staff using this Policy.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

Conclusion

Existing good practice within Uffculme Academy Trust in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the school operates ensure that cases of suspected fraud or impropriety should not occur. This whistleblowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the trust. This document is a public commitment that concerns are taken seriously and will be actioned.

Law Relating To This Document

Employment Rights Act 1996
Public Interest Disclosures Act 1998

Reviewed September 2016