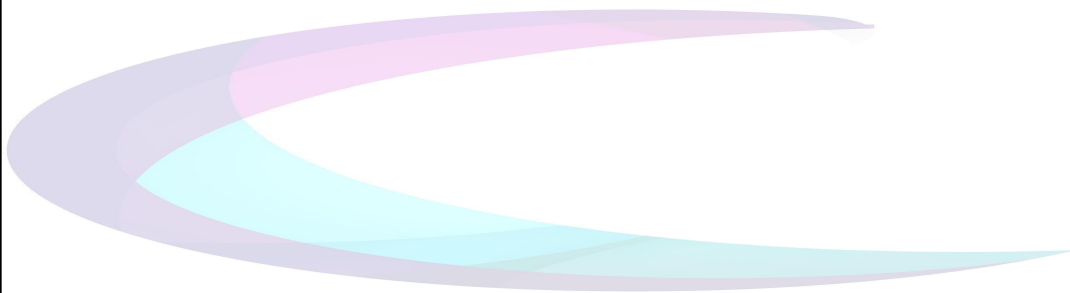




TTLT Whistleblowing Policy & Procedure May 2024



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1.1. Review and approval

The Trustees of the Tapscott Learning Trust have overall responsibility for the policy.

The CEO is responsible for the operation of the policy within the schools, as well as for the maintenance of a record of concerns raised in accordance with this policy and the outcomes.

This policy is reviewed every 3 years by the Trust's Senior Leadership Team and will be ratified by the Board of Trustees.

2. THE POLICY

2.1. Introduction

The Tapscott Learning Trust is committed to conducting with honesty and integrity and expects all staff to maintain high standards in accordance with our contractual obligations and our policies and procedures from time to time in force.

This policy reflects our current practices and applies to every individual working for the Trust irrespective of their status, level or grade. It therefore includes, the Headteacher, Heads of Department, members of the Senior Leadership Team, directors, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "you" and "Staff" in this policy) who are advised to familiarise themselves with its content.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harboring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

2.2. Aims

This Whistleblowing Policy is intended 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 without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and is not intended

to have contractual effect. It is provided for guidance to all members of staff at the Trust and we reserve the right to amend its content at any time.

What is whistleblowing?

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

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Staff Code of Conduct;
- conduct likely to damage the Trust's reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern that they believe is in the public interest relating to any of the above. If you have any genuine concern related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

By adopting this policy across our Trust, we aim to reassure our staff that they can safely raise concerns about malpractice internally. This will enable us to investigate and deal with such concerns raised and continue to foster a responsible and accountable culture in the organisation.

Staff and members of the school local governing bodies are expected to notify the school of any reasonable and genuine concerns they have about an abuse of the school's (or indeed the Trust's) stated standards, malpractice, theft, fraud, financial abuse, criminal offences, breach of legal obligations, dereliction of the school's health and safety responsibilities, damage to the environment, other unethical conduct or the cover up of any of these.

Confidentiality

We hope that our staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise a concern confidentially, we will endeavour to keep your identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you first. If disciplinary or other proceedings follow the investigation, it may not be possible to take action

as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered support.

Although a concern may be made anonymously, we encourage staff to put their name to their allegation whenever possible. Concerns that are expressed completely anonymously are much less powerful and proper investigation may be much more difficult or impossible. It is also much more difficult to establish whether any allegations are credible and to protect your position or to give feedback on the outcome of investigations.

We will consider anonymous concerns at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

The policy is not designed to replace the Grievance, Disciplinary or Early Help, Child Protection and Safeguarding policies and procedures. Concerns or allegations that fall within the scope of specific procedures will normally be referred for consideration under those procedures.

The policy is only about employees and local governors, and it is not a replacement for the school's Complaints Policy and other statutory reporting procedures that may apply. The Whistleblowing Policy is primarily to protect the interests of others or of the organisation.

Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We are committed to good practice and high standards. We aim to encourage openness and will support Staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the [Headteacher/Principal] immediately. If the matter is not remedied to your satisfaction, you should raise it formally using our [Grievance Policy and Procedure]. No member of staff must threaten or retaliate against an individual who has raised a concern in any way. We will not tolerate any such harassment or victimisation, and anyone involved in such conduct will be subject to disciplinary action.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

The aim of the Whistleblowing Policy is to enable employees to raise their concerns in-house and to be assured that action will be taken quickly and effectively. It should not be necessary, in most cases, to take concerns outside the school and especially to the media. Staff have a duty of confidentiality towards the school. It is a serious matter to disclose confidential information.

3.0. PROCEDURE

3.1 How we handle concerns when they are raised

3.1.1. Step one – how to raise a concern

Employees who have a concern about any wrongdoing should normally raise their concerns with their line manager. If, however, you feel unable to raise the matter with your line manager, for good reason, you may raise the concern with your Head Teacher or another senior member of school staff. If you feel unable to raise your concern with any member of the school management you may raise it with a member of your local advisory board. The names of all school governors, and their positions, are published on our school websites.

Concerns may be raised orally or in writing. The person with whom you raised the concern may have a preliminary meeting with you to discuss the most appropriate route. You may bring a colleague or trade union representative to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation.

If you are raising a concern about the Head teacher, you should contact the CEO of the Trust. If you are not able to do so, you should raise it with the Chair of your Local Advisory Board.

If you are raising a concern about the CEO, you should contact the Chair of Trustees of the Tapscott Learning Trust, or the local LADO (Local Authority Designated Officer).

If you are raising concerns as a local school governor you should speak to the Chair of the Local Advisory Board. If you feel unable to raise the matter with them for good reason, you should, in the first instance, make contact with the Chair of Trustees (details as published on the Trust's website).

It would be helpful if you can provide as a minimum the following information:

- the nature of the concern and why you believe it to be true; and
- the background and history of the concern (giving relevant dates where possible).

3.1.2. Step two – what happens once a concern has been raised?

After the meeting, we will carry out an initial assessment to determine the scope of any investigation required. We will inform you of the outcome of this assessment. You may be required to attend additional meetings in order to provide further information of the concerns you have raised.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter (this may include externally appointed persons). The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. It will endeavour to complete its investigation within a reasonable timeframe. However, sometimes the need for confidentiality may prevent us from giving specific details of the investigation or any disciplinary action or other action taken as a result. You are required to treat any information about the investigation as strictly confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may (where they are an employee) be subject to disciplinary action under our Disciplinary Policy and Procedure.

If you are not Satisfied

Whilst we cannot always guarantee the outcome you are seeking, we will try to deal with the concern fairly, professionally and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts outlined above.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. We would expect that in almost all cases, raising the concern internally would be the most appropriate course of action and you should not find it necessary to alert anyone externally.

However, if for whatever reason, you feel you cannot raise your concern internally and you reasonably believe the information and any allegations are substantially true, the law recognises that in some circumstances it may be appropriate for you to report your concern to another prescribed person, such as a regulator or professional body. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed people and bodies for reporting certain types of concern (see 3.2 below).

Where your concern is regarding our safeguarding practices, and you feel unable to raise it internally or have concerns about the way your concern is being handled by us, you can contact the NSPCC whistleblowing advice line on 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk. Alternatively, you can write to: National Society for the Prevention of Cruelty

to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

3.2 Independent advice and helpline

Protect (formerly known as Public Concern at Work) is a source of further information and advice at protect-advice.org.uk. Protect provides free, confidential whistleblowing advice, and can be contacted online via its website: protect-advice.org.uk/contact-protect-advice-line or by telephone on 020 3117 2520.

All Staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. 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 Headteacher in the first instance.



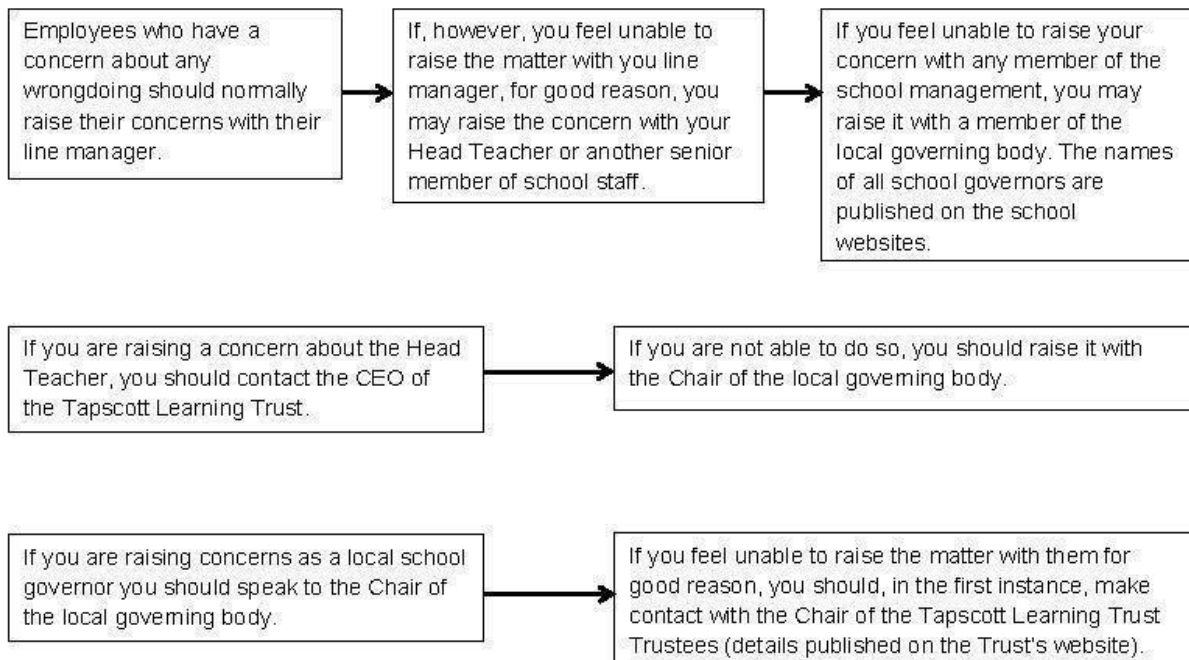
Whistleblowing Flowchart



Staff and members of the school local governing bodies are expected to notify the school of any reasonable and genuine concerns they have about an abuse of the school's (or indeed the Trust's) stated standards, malpractice, theft, fraud, financial abuse, criminal offences, breach of legal obligations, dereliction of the school's health and safety responsibilities, damage to the environment, other unethical conduct or the cover up of any of these.

How to Raise a Concern

Concerns may be raised orally or in writing. Make it clear if you want to raise the matter in confidence.



There may be circumstances where progressing through the internal route has failed and you can only properly report your concern to external bodies who have responsibilities to monitor the school's compliance to its own standards and legal obligations. In most cases the most appropriate body would be the school's external auditors, details of whom can be obtained from the school office.