



# Confidential Reporting (Whistle Blowing) Policy

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## 1. Introduction

CORE Education Trust is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Employees are often the first to realise that there may be something seriously wrong within an organisation. They may not however express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organisation. 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 a suspicion of malpractice.

CORE Education Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the Trust's work to come forward and voice those concerns as soon as possible. They are able to do so in the knowledge that their concerns will be taken seriously and investigated as appropriate, and their confidentiality will be respected.

This policy document makes it clear that employees can do so without fear of victimisation, subsequent discrimination or disadvantage. The Confidential Reporting policy is intended to encourage and enable employees to raise concerns within CORE Education Trust rather than overlooking a problem or "blowing the whistle" outside.

The policy applies to all employees and those contractors working for CORE Education Trust on Trust premises, for example, agency staff, builders and drivers. It also covers suppliers and those providing services under a contract with the Trust in their own premises, for example, working with Community Organisations. This policy does not form part of any employee's contract of employment and it may be amended at any time.

The procedures are in addition to CORE Education Trust complaints procedures and other statutory reporting procedures. All employees are responsible for making service users aware of the existence of these procedures.

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

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

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which it might be improved. Comments, suggestions and queries should be address to the Headteacher.

## 2. Aims and Scope of the Policy

This policy aims to: -

- Encourage employees to feel confident in raising serious concerns and to questions and act upon concerns about practice.
- Provide avenues for employees to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith, even if the employees turn out to be mistaken.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Confidential Reporting Policy is intended to cover major concerns that fall outside the scope of other procedures. These include: -

- Conduct which is an offence or a breach of law.
- Disclosures related to miscarriages of justice.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Mistreatment or abuse of a pupil, parent or member of the public for whom the Trust has a responsibility.
- Conduct likely to damage reputation.
- Unauthorised disclosure of confidential information.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of public funds.
- Possible fraud and corruption.
- Sexual or physical abuse of clients.
- Other unethical conduct.

Thus, any serious concerns that you have about any aspect of service provision or the conduct of officers or member of CORE Education Trust or others acting on behalf of the Trust can be reported under the Confidential Reporting Policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe CORE Education Trust subscribes to.
- Is against CORE Education Trust's Standing Orders, financial regulations and policies.

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- Falls below established standards of practice.
- Amounts to improper conduct.

This policy does not replace the CORE Education Trust complaints procedure.

CORE Office address and contact details are available on the website: [www.core-education.co.uk](http://www.core-education.co.uk)

### 3. Safeguards

CORE Education Trust is committed to good practice and high standards and wants to be supportive of employees. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

CORE Education Trust recognises that the decision to report a concern can be a difficult one to make and that whistle-blowers are sometimes worried about possible repercussions.

Whistle-blowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Headteacher immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

CORE Education Trust will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

### 4. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. We do not encourage staff to make disclosures anonymously. 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. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Headteacher and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

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## 5. Malicious 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 an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

## 6. How to Raise a Concern

As a first step you should normally raise a concern with your immediate line manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved, you should approach the Chair of Directors. If it includes the Chair of Directors, you should approach the Vice Chair.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to provide the following information.

- The background and history of the concern (giving relevant dates).
- The reason why you are particularly concerned about the situation.
- You should also, as far as possible, provide evidence to support your concern.

The earlier you express the concern the easier it is to act.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two or more of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

## 7. How CORE Education Trust will Respond: -

CORE Education Trust will respond to your concerns.

Where appropriate, the matters raised may: -

- Be investigated by management, internal audit, the Monitoring Officer or through the disciplinary process.
- Be referred to the police.
- Be referred to the external auditor.
- Form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and if so, what form it should take. The overriding principle which CORE Education Trust will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

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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 raised, the Responsible Officer will write to you:

- Acknowledging that the concern has been received.
- Indicating how we propose 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.
- Supplying you with information on staff support mechanisms.
- Telling you whether further investigations will take place and if not, why not.

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, CORE Education Trust will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

CORE Education Trust will take steps to minimise any difficulties which you may experience because of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings CORE Education Trust will arrange for you to receive advice about the procedure.

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

## **8. How the Matter can be Taken Further**

This policy is intended to provide you with an avenue within CORE Education Trust to raise concerns. CORE Education Trust hopes you will be satisfied with any action taken. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly 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 the Headteacher. Alternatively, you may contact our external auditors. In most cases you should not find it necessary to alert anyone externally. However, the law recognises that in some

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circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The following are possible contact points:

- The designated independent whistleblowing charity, Public Concern at Work [www.pcaaw.org.uk](http://www.pcaaw.org.uk), who operate a confidential helpline 0207 404 6609.
- The external auditor.
- Your trade union.
- Your local Citizens Advice Bureau.
- Relevant professional bodies or regulatory organisations.
- A relevant voluntary organisation.
- The police.
- The EFA.

If you do take the matter outside CORE Education Trust, you should ensure that you do not disclose confidential information. Check with the contact point about that.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to actions of a third party. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

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<b>Publication Date</b>	Autumn 2017	<b>Owner</b>	Chief Operating Officer
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