



ST GEORGE'S ACADEMY

WHISTLE-BLOWING POLICY

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Policy Statement

Background	<p>The Public Interest Disclosure Act 1998, shortened to PIDA, is the law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 (ERA). The Act sets out a simple framework to promote responsible whistle-blowing.</p> <p>PIDA makes it unlawful to subject a <u>worker</u> to negative treatment or to dismiss them because they have raised a whistleblowing concern. Raising a whistleblowing concern is also known as a making a '<i>protected disclosure</i>' in law.</p>
Statement	<p>St George's Academy 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.</p>
Responsibilities	<p>The Governing Body has overall responsibility for this policy, for ensuring compliance with the relevant statutory framework and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Governing Body delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Vice Principal Corporate Services and the HR Manager.</p> <p>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 HR Manager.</p>



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Target Audience	The policy applies to all staff members or other workers who provide services to the Academy in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.
Dissemination	Website and X drive
Equality and Diversity	As part of our on-going commitment to promoting equality and valuing diversity, St George's Academy is committed to eliminating discrimination against any individual on the grounds of the nine protected characteristics defined by the Equality Act (2010) age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

1. Introduction

1.1 Any individual at one time or another may have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are related to unlawful conduct, financial malpractice, fraud and corruption, it can be difficult to know what to do.

1.2 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
- To provide staff with guidance as to how to raise those concerns
- To set clear procedures for how the Academy will respond to such concerns
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

1.3 This policy does not form part of staff contracts of employment and may be amended at any time.

2. What is Whistle-blowing

2.1 "**Whistle-blowing**" is the disclosure of information that relates to suspected wrongdoing or dangers at work. A qualifying disclosure must be based on the reasonable belief that the disclosure is in the public interest. This may include but is not limited to:

- Criminal activity
- Failure to comply with any legal or professional obligation or regulatory requirements
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Bribery
- Financial fraud or mismanagement
- Breach of the Academy's internal policies and procedures
- Conduct likely to damage the Academy's reputation or financial wellbeing
- Unauthorised disclosure of confidential information
- Negligence
- Inappropriate use of school assets or funds
- The deliberate concealment of any of the above matters



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2.2 A "whistle-blower" is a person who raises a genuine concern relating to any of the above. Where an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of the Academy activities (a "Whistle-blowing concern") they should report it under this policy.

2.3 This policy should not be used for complaints relating to an individual's own personal circumstances, such as the way they have been treated at work. In such cases, individuals should use the Academy's Grievance Policy or Complaints Policy.

2.4 If an individual is uncertain whether something is within the scope of this policy, they are encouraged to seek advice from the HR Manager in the first instance (see section 10).

3. Raising a Whistle-blowing concern

3.1 If a member of staff has concerns that cannot be resolved by the usual route using other policies, they should utilise this procedure. HR advice will always be available via the HR Manager should a member of staff be undecided as to what is the most appropriate action to take.

3.2 Where an individual has reason to believe that underhand or illegal practices are taking place, the individual is encouraged to make his or her disclosure immediately.

3.3 The whistle-blowing procedure has the following steps:

- The individual should raise their concern with their immediate line manager or the Vice Principal Corporate Services. This may be done orally or in writing. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. We will respect the confidentiality of the individual. The individual should make it clear if other procedure opportunities have failed and that the issue is now being raised under the Whistle-blowing Policy and Procedure.
- In many cases the individual's line manager may be able to agree a way of resolving the individual's concern quickly and effectively.
- If the individual feels they cannot report the issue to their immediate line manager or the Vice Principal Corporate Services or where the matter is more serious or the individual feels their concern has not been addressed, they should refer the case to the Whistleblowing Officer whose details can be found in section 10

3.4 The Whistleblowing Officer will arrange a meeting with the individual as soon as possible to discuss their concern. The individual may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

3.5 The Academy will take down a written summary of the concern and provide the individual with a copy after the meeting. The Academy will also aim to provide an indication of how it proposes to deal with the matter.

4. Confidentiality

4.1 The Academy hopes that individuals will feel able to voice whistleblowing concerns openly under this policy. However, if an individual wishes to raise a concern confidentially, the Academy will make every effort to conceal their



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identity. If it is necessary for anyone investigating the concern to know the individual's identity, the Academy will normally discuss this with the individual first.

4.2 The Academy does not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if it cannot obtain further information. 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 one of the contact points listed in section 10 and appropriate measures can then be taken to preserve confidentiality in so far as is practicable. If the individual is in any doubt, advice is available from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this policy.

5. Investigation and outcome

5.1 Once an individual has raised a concern, the Academy will carry out an initial assessment to determine the scope of any investigation. The Academy will usually inform the individual of the outcome of the assessment. The individual may be required to attend additional meetings in order to provide further information.

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

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

5.4 If the Academy concludes that a whistle-blower has made false accusations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

6. If the individual raising the concern remains unsatisfied

6.1 While the Academy cannot always guarantee the outcome an individual may be seeking, it will try to deal with concerns fairly and in an appropriate way. By using this policy, individuals can help the Academy to achieve this.

6.2 If an individual has genuine concerns about how the Academy has handled their whistle-blowing disclosure, they can write to the Clerk to the Governors (see Section 10). The Clerk may ask for another assessment to take place (see section 5.1) but does not have the authority to re-investigate the original complaint / disclosure.

6.3 Should an individual remain dissatisfied with the handling of their disclosure, they also have the freedom to report their concern directly to the Chair of the Governing Board. The Chair of the Governing Board has the authority to review the case paperwork and issue a final ruling or recommendation, as appropriate.



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7. External disclosures

7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, an individual should not find it necessary to alert anyone externally.

7.2 The law recognises that in some circumstances it may be appropriate for an individual to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. The Academy strongly encourages individuals to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. It also holds a list of prescribed regulators for reporting certain types of concern. Their contact details are at paragraph 10 of this policy.

7.3 Whistle-blowing concerns usually relate to the conduct of Academy staff, but they may sometimes relate to the actions of a third party. In some circumstances, the law will protect an individual if they raise the matter with the third party directly. However, the Academy encourages individuals to report such concerns internally first. Individuals should contact their line manager or one of the other individuals set out in section 10.

8. Protection and support for Whistle-blowers

8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The Academy aims to encourage openness and will support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.

8.2 Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the HR Manager immediately. If the matter is not remedied, they should raise it formally using the Academy's Grievance Policy or Complaints Policy.

8.3 In instances where an allegation of such treatment involves the HR Manager, or a member of the HR Department, the individual should raise it with the Clerk to the Governors.

8.4 Members of staff must not threaten or retaliate against whistle-blowers in any way. Any staff members involved in such conduct may be subject to disciplinary action.

9. Monitoring and review

9.1 The Vice Principal, Corporate Services, in conjunction with the HR Manager, will monitor the use and effectiveness of the Whistle-blowing policy.

9.2 The Policy will be promoted and implemented throughout the Academy.



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10. Contacts

Vice Principal, Corporate Services	Janie Lau Telephone: 01529 301160 Email: janie.lau@st-georges-academy.org
Whistle-blowing Officer	Rachel Madge Telephone: 01529 301187 Email: rachel.madge@st-georges-academy.org
Chairman of the Board of Governors	Graham Arnold Email: graham.arnold@st-georges-academy.org
Clerk to the Governors	Victoria Ulllyatt-Sands Email: victoria.ullyatt-sands@st-georges-academy.org
Protect (formerly Public Concern at Work) (Independent Whistle-blowing charity)	Advice Line: 020 3117 2520 (*option 1) E-mail: whistle@protect-advice.org.uk Website: https://protect-advice.org.uk/
NSPCC Whistleblowing Advice Line	0800 0280285 help@NSPCC.org.uk

Policy Developed by: Rachel Madge, HR Manager

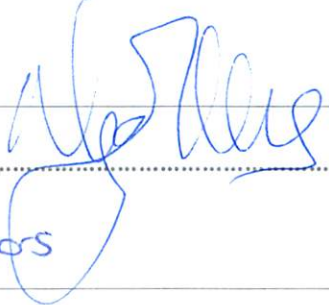
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Name N. Horner Signature 

Committee: Co-Chair of Governors