



WHISTLEBLOWING POLICY

(Students, parents and visitors)

Key document details

Ratified: August 2017

Approver: Chief Executive Officer

Reviewed: May 2020

Next review: June 2023

1. CONTEXT

1.1 The Trust Board is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, it encourages all students, parents and visitors with significant concerns about any aspect of the work of Venturers Trust and/or its Academies, to come forward and voice those concerns. It also recognises that certain cases will have to proceed on a confidential basis. This policy makes it clear that individuals can raise concerns without fear of reprisals.

2. PURPOSE AND SCOPE

2.1 This policy is applicable to all students, parents and visitors of Venturers Trust and its constituent academies.

It aims to:

- encourage individuals to feel confident in raising serious concerns, and to question and act upon those concerns;
- provide avenues for individuals to raise concerns, and then receive feedback on any action taken; ensure that individuals receive a response to their concerns, and that they are made aware of how to pursue them if they are not satisfied with the response;
- reassure individuals that they will be protected from possible reprisals or victimisation as long as they have a reasonable belief that they have made any disclosure in good faith.

2.2 Existing procedures are in place to enable students, parents and visitors to lodge a grievance. This policy is intended to cover any significant concern that an individual has about any aspect of service provision, or the conduct of employees of the Trust. It is intended that protection afforded under this policy is given where an individual raises concerns with the reasonable belief that it is in the public interest and not for personal interest or gain.

This concern may be about something that is:

- improper conduct; or
- against established standards of practice; or
- against the Trust Board's Policies, Financial Regulations or Instructions; or
- unlawful.

2.3 An individual's concerns about malpractice may in this context include concerns about:

- possible corruption;
- dangerous procedures risking health and safety;
- abuse of students;
- evasion of statutory responsibilities;
- damage to the environment or other unethical or improper conduct.

The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied.

3. PRINCIPLES

3.1 The Trust Board assures students, parents and visitors that it recognises their right to raise concerns about any potential malpractice within the organisation. If an allegation is made that this has occurred, an investigation will take place and, if the allegation is found to be substantiated, it will be considered a serious disciplinary offence and action will be taken accordingly.

3.2 For their part students, parents and visitors have a right and also a duty to raise concerns when they have a reasonable belief that malpractice may be occurring or have occurred.

3.3 Whenever possible, the Trust Board will protect the identity of any individual who raises a concern and does not want his/her name to be disclosed. However, it must be understood that any investigation process may reveal the source of the information and a statement by the person reporting the concern may be required as part of the evidence. (The Freedom of Information Act or legal proceedings may also have a bearing on the disclosure of identities subsequently).

3.4 Concerns expressed anonymously will be considered at the discretion of the Trust Board. In exercising this discretion the factors to be taken into account will include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of obtaining the necessary further information.

3.5 The Trust Board will offer support to an individual who has raised a concern in accordance with this policy. The purpose of this support will be to ensure, where possible, that the individual concerned does not suffer as a result of his/her action.

4. PROCEDURES

4.1 Concerns should normally be raised initially with an appropriate member of staff or with the Principal of the respective Academy. However, the most appropriate person to contact will depend on the degree and sensitivity of the issues involved and who is suspected of malpractice. If the individual feels that it is inappropriate to contact a member of staff or the Principal, he/she may contact

- The Trust's Chief Executive Officer or;
- Trust Chair of Governors

N.B. All staff must be aware of their responsibilities in responding to any concerns raised with them.

4.2 Concerns may be raised orally or in writing, and it must be made clear that they are being raised under the Whistleblowing policy. Individuals who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates);
- the reason why he/she is particularly concerned about the situation

4.3 It should be noted that often the earlier a concern is expressed the easier it is to take appropriate action.

4.4 Although the individual is not expected to prove the truth of an allegation that is made, it will be necessary to demonstrate to the person contacted that there are sufficient grounds for concern.

4.5 A friend or representative can be invited to put the case forward on his/her behalf.

4.6 If the individual wishes to raise his/her concern anonymously, he/she should make this clear to the person he/she chooses to contact.

4.7 The member of staff approached by the individual must take the appropriate steps to ensure the issue raised is investigated by the appropriate person.

4.8 Once the concern has been raised, the individual will be contacted **within five working days** by a senior manager or the Chair of Governors, who will arrange to discuss the matter. The individual may be accompanied by a friend at this meeting, for the purpose of providing support.

4.9 Following this discussion, an initial response will be given to the individual within **five working days**, indicating either the steps that are being taken to investigate the matter or the reasons why no further action is being taken. During the course of any investigation of the concerns it may be necessary to contact the individual for assistance or clarification. He/she will be kept informed of the progress of the investigation and notified of its resolution but not necessarily the outcome.

4.10 When the matter has been fully investigated and a conclusion reached, a formal written response will be sent to the individual who raised the concerns. As part of the Trust's final written response, the individual will be offered the opportunity to meet with either the Principal, Chief Executive Officer or Chair of Governors should he/she feel his/her concerns are unresolved unless the matter has been referred to for example the police for further investigation.

5. HOW THE ACADEMY/TRUST WILL RESPOND

5.1 The action taken by the Academy/Trust will depend on the nature of the concern. Where appropriate, the matters raised will:

- be investigated by management, The Responsible Officer (in all cases involving financial irregularity or corruption), or through disciplinary procedures; and/or
- be referred to the Police; and/or
- form the subject of an independent enquiry.

5.2 In order to protect individuals, the Trust Board or Senior Leader, will conduct initial enquiries to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or adult abuse issues) will normally be referred for consideration under the appropriate procedure. Where one or more procedures are followed at the same time, care must be taken to ensure that the procedures do not conflict.

5.3 It should be noted that some concerns may be resolved by agreed action without the need for investigation. Equally, some issues may be investigated without the need for initial

enquiries. If urgent action is required this may be taken before any investigation is conducted - if there is sufficient initial evidence to indicate that such action is warranted, e.g. suspension of an employee while investigations are undertaken.

6. HOW THE MATTER CAN BE TAKEN FURTHER

6.1 The policy is intended to provide individuals with an avenue for raising concerns with those responsible for the malpractice in question, e.g. the Trust Board. It is expected that this avenue will be followed by the individual initially. However, if an individual is dissatisfied with the response of the Trust Board or Senior Leader, he/she can raise the matter with any of the following, as appropriate:

- The Police;
- Public Concern at Work (020 3117 2520);
- A relevant professional body or inspectorate (e.g. OfSTED);
- The Local Government Ombudsman;

6.2 In taking their concern outside the Trust, individuals should ensure that, so far as possible, the matter is raised without confidential information being divulged (e.g. relating to students or other employees).

7. MONITORING POLICY

7.1 The Principal/Chief Executive Officer is responsible, on behalf of the Trust Board for registering the nature of all concerns raised and for recording the outcome. He/she will produce an annual report which identifies any patterns of concern and assesses the effectiveness of the policy.

8. RESPONSIBILITY FOR IMPLEMENTING THE POLICY

8.1 The responsibility for ensuring that all individuals follow this policy rests with the Chief Executive Officer.