



Whistle Blowing Policy

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Introduction

Veritas Multi Academy Trust is committed to the highest possible standards of openness, probity and accountability and we encourage employees and others working with us to raise any concerns about any aspect of our work, to come forward and voice those concerns. In some instances, concerns may need to be expressed on a confidential basis.

This procedure encourages employees to raise serious concerns, without fear of reprisal or victimisation, internally within Veritas Multi Academy Trust rather than over-looking a problem or raising the matter outside.

It applies to all employees, agency workers and those contractors working on Veritas Multi Academy Trust premises, for example, cleaners, builders and drivers. It also covers suppliers and those providing services under a contract with Veritas Multi Academy Trust in their own premises.

The requirement to have clear whistle-blowing procedures in place is set out in the [Academy Trust Handbook](https://www.gov.uk/guidance/academies-financial-handbook/academy-trust-handbook-2021) <https://www.gov.uk/guidance/academies-financial-handbook/academy-trust-handbook-2021> and Keeping Children Safe in Education (KCSIE).

This policy has been written in line with the above documents, as well as [government guidance on whistle-blowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

Other Complaints Procedures

This procedure is separate from the Trust's Complaints Procedures and other statutory reporting procedures.

Any investigation into allegations of potential malpractice under this procedure will not influence or be influenced by any disciplinary or redundancy procedures that already affects an individual.

Aim & Scope

This procedure aims to ensure individuals are:

- encouraged to feel confident in raising serious concerns and to question and act upon concerns about practice;
- provided with avenues to raise concerns and receive feedback on any action taken;
- given a response to their concerns and are aware of how to pursue them if not satisfied;
- reassured that they will be protected from reprisals or victimisation if they have a reasonable belief any disclosure has been made in good faith.
- All staff are aware of the whistleblowing process and how concerns will be managed.

There are existing procedures in place to enable individuals to lodge a grievance relating to their own employment including issues relating to harassment and bullying. This procedure is intended to cover concerns that fall outside the scope of other procedures.

These include (but not limited to):

- conduct which is, has been or is likely to be an offence or breach of law;
- conduct that has occurred, is occurring or is likely occur the result of which Veritas Multi Academy Trust fails to comply with a legal obligation. For example, unauthorised use of public funds, possible fraud and corruption, sexual or physical abuse of clients, or other unethical conduct discrimination of any kind and waste/frivolous expenditure;
- conduct which puts pupil's or staff health and safety being put in danger;
- disclosures related to past, current or likely miscarriages of justice;
- past, current or likely health and safety risks, including risks to the public as well as other employees (see below);
- past, current or likely damage to the environment.

A whistle-blower is a person who raises a genuine concern relating to the above.

Concerns about any aspect of service provision or the conduct of The Senior Team, Governors, MAT Trustees or academy Staff Members or others acting on behalf of the academy, can be reported under the Confidential Disclosure Procedure within the Fairness at Work Policy. This may be about something that you:

- feel uncomfortable about in terms of known standards, your experience or the standards they believe Veritas Multi Academy Trust subscribes to: or
- is against the MAT's Standing Orders and policies; or
- falls below established standards of practice; or
- amounts to improper conduct.

Confidentiality

All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if this is your wish. However, in certain cases, it may not be possible to maintain confidentiality if you are required to come forward as a witness.

Anonymous Allegations

Whenever possible you should put your name to your allegation as concerns expressed anonymously are much less powerful than those that are attributed to a named individual. However, anonymous allegations will be considered and investigated at the CEO's or Chair of Trustee's discretion.

In exercising discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If you make an allegation in good faith that is not subsequently confirmed by an investigation, no action will be taken. Disciplinary action will be taken against individuals who knowingly make false, malicious or vexatious allegations.

How to Raise a Concern

General

Concerns can be raised verbally or in writing. A concern raised in writing should:

- set out the background and history of the concern, giving names, dates and places where possible;
- the reason why you are particularly concerned about the situation.

The earlier a concern is raised the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you need to demonstrate to the person contacted that there are sufficient grounds for your concern.

A trade union or professional association may raise a matter on behalf of an employee.

Step One – Raising a Concern

Whenever possible you should raise your concern with your immediate manager, your headteacher, the CEO or Chair of the Trust Board. If this is not appropriate, you should approach the MAT Governance Professional who will direct you to an appropriate Local Academy Committee Governor, Trustee or advisory body, to hear your concern.

Email: governance.professional@veritasmat.co.uk

The Education & Skills Funding Agency has an **Anti Fraud Checklist for Academy Trusts** and all suspected financial irregularities must be reported to the Chair of the Trust Board.

Step Two - Responding

The action taken will depend on the nature of the concern. The matters raised may:

- be investigated internally by management, Internal Audit or through the disciplinary or other internal process;
- be referred to the Police;

- be referred to the External Auditor;
- be referred to the appropriate office at KCC or MAT;
- form the subject of an independent inquiry.

In order to protect individuals and Veritas Multi Academy Trust, initial enquiries will be made 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 (e.g., child protection or discrimination issues) will normally be referred for consideration under those procedures.

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.

The Trust will ensure all concern raised by whistleblowers are responded to properly and fairly.

Investigating the concern

If an investigation is required, the concern received by the

When a concern is received by the [headteacher/CEO/trustee/other named person] – referred to from here as the ‘recipient’ – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting, and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see this section of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the CEO, Local Academy Committee Chair and/or Chair of Trustees, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police.
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

Outcome

Within ten working days, the responsible person will write to you:

- acknowledging that the concern has been received;
- indicating how Veritas Multi Academy Trust proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- informing you if any initial enquiries have been made;
- whether further investigations will take place and, if not, why not.

Contact

The amount of contact between the CEO or if referred to the MAT Board, the officers considering the issues and the staff involved in the whistleblowing will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

Attending Meetings

When a meeting is arranged staff members have the right to be accompanied by a trade union representative or a workplace colleague who is not involved in the area of work to which the concern relates.

Support

The CEO or Chair of the Trust Board of Veritas Multi Academy Trust (and where appropriate MAT Trustees) will take steps to minimise any difficulties you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, KCC or the MAT Board will advise or arrange for you to have advice about the procedure.

The CEO and Trustees of Veritas Multi Academy Trust will not tolerate harassment or victimisation (including informal pressures) and will take action to protect individuals who raise a concern in good faith.

The CEO and Trustees of Veritas Multi Academy Trust accepts that you need to be assured that concerns will be properly addressed and, subject to legal constraints, will provide information about the outcomes of any investigations.

How The Matter Can Be Taken Further

This procedure is intended to provide individuals with an avenue to raise concerns within Veritas Multi Academy Trust and where appropriate within KCC. If you are not satisfied, and feel it is right to take the matter further, the following are possible contact points:

- Public Concern at Work
- Audit Commission
- Relevant professional bodies or regulatory organisations
- Solicitor
- Police

If a matter is taken outside the MAT, you must take all reasonable steps to ensure that confidential or privileged information is not disclosed. If in doubt, check with the MAT Company Secretary.

Public Interest Disclosure

Public Interest Disclosure Act 1998 gives employees two safeguards in respect of disclosures of information.

- An employee is entitled not be subjected to any detriment by virtue of having made a protected disclosure.
- The dismissal of any MAT employee directly due to the individual having made such a disclosure will automatically be unfair.