

Whistleblowing Policy

Policy document provenance

Approver:	Board of trustees
Reviewed by:	Audit and risk committee
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Policy authors:	Head of governance
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Summary of changes since last review:	<ul style="list-style-type: none"> • All references to governors have changed to ambassadors • All references to chair of governors has changed to chair of audit and risk committee • The legislation surrounding the policy has been included • A new section has been added relating to malicious or vexatious allegations • Safeguarding disclosures have been made clearer under item 4.0 • Data protection has been added to the confidentiality section in line with corporate governance standards on ethics • Escalated or unresolved whistleblowing concerns will be reported to the chair of the audit and risk committee • Contact details at the end of the policy have been updated
Related policies and documents:	<ul style="list-style-type: none"> • Keeping children safe in education 2024 • Professional code of conduct • Child protection and safeguarding policy • Complaints policy • Staff grievance policy • Records retention and data management policy

Unless there are legislative or regulatory changes in the interim, the policy will be reviewed as by the review cycle. Should no substantive change be required at this point, the policy will move to the next review cycle.

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1.0 Introduction

Dixons Academies Trust is committed to the highest possible standards of honesty and integrity, and expects all staff to maintain these standards in accordance with our code of conduct (see professional conduct policy).

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 or to address them when they do occur.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

2.0 Legislation

The requirement to have a clear whistleblowing policy and procedures is set out in the Academy Trust Handbook. This policy has been written in line with this document as well as government guidance on whistleblowing. We have also taken into account the Public Interest Disclosure Act, which protects any whistleblowing worker who disclose their concerns in the public interest.

3.0 Scope and purpose

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
- set clear procedures for how our trust will respond to such concerns
- to provide staff with guidance on how to raise concerns
- to reassure staff that they should be able to raise concerns without fear of reprisals, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy applies to all employees of our trust, members, trustees, ambassadors, consultants, contractors, casual and agency staff, and volunteers (collectively referred to as staff in this policy).

4.0 What is whistleblowing?

4.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specific matters or 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief of wrongdoing or dangers at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- bribery
- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures [including our Code of Conduct]
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- other unethical behaviour
- the deliberate concealment of any of the above matters

4.2 A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it.

4.3 A whistleblower is a person who raises a genuine concern to any of the above items. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

4.4 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure.

4.5 If you are uncertain whether something is within the scope of this policy, you should seek advice from a member of the academy leadership team or the school trust leader.

4.6 For the avoidance of doubt, nothing within this policy is intended to prevent staff from complying with their obligations as stated in the statutory guidance Department for Education's (DfE) statutory guidance, Keeping Children Safe in Education or in our child protection and safeguarding policy.



- 4.7 All staff in our trust must report any safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported directly to the academy principal or designated safeguarding lead (DSL) as outlined in our child protection and safeguarding policy.

5.0 Raising a whistleblowing concern

- 5.1 We hope that you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- 5.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, or they are the subject of the complaint, then you can raise the matter with:
- the principal (for academy staff) or the chief executive (for operations and / or central staff)
 - the chair of the audit and risk committee
- Contact details are set out at the end of this policy.
- 5.3 If your concerns are about allegations by the principal, you should contact the chief executive.
- 5.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 5.5 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.

6.0 Confidentiality and data protection

- 6.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 6.2 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. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 5.2 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can see advice from Protect, the independent whistleblowing charity who offers a confidential helpline. Their contact details are given at the end of this policy.
- 6.3 Where we receive anonymous complaints, we will make a determination about whether to investigate based on:
- the seriousness of the issue raised
 - the credibility of the concern
 - the likelihood of confirming the allegation from other sources
- We will keep a central record of disclosures made under the Whistleblowing Policy.
- 6.4 We will comply with data protection requirements in terms of any records made and kept.
- 6.5 As part of the application of this policy, our trust may collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of data protection legislation (the UK GDPR and the Data protection Act 1998) in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our records retention policy and in line with the requirements of data protection legislation.

7.0 External disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying the wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.
- 7.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. 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 external. Protect, the independent whistleblowing charity, holds a list of prescribed regulators for reporting certain types of concern. Their contact details are provided at the end of this policy. Alternatively, the list is available from the Department for Business and Trade.
- 7.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns initially first. You should contact your line manager or one of the other individuals set out in paragraph 5.2 for guidance.

8.0 Investigation and outcome

- 8.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 8.2 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. The investigator(s) will collate findings on the matter and make any recommendations for change to enable us to minimise the risk of future wrongdoing. This will be sent to the principal, chief executive and / or the board of trustees for actioning.
- 8.3 We will aim to keep you informed of the progress of the investigation, its likely timescale and outcome. 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.

9.0 Malicious or vexatious allegations

- 8.1 Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.
- 8.2 If we conclude that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower may be subject to disciplinary action.

10.0 If you are not satisfied

- 10.1 Whilst we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 10.2 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 in paragraph 5.2. Alternatively, you may contact the chair of the audit and risk committee or our external auditors. Contact details are set out at the end of this policy.

11.0 Protection and support for whistleblowers

- 11.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 11.2 Staff must not suffer any detrimental treatment as a result of raising a genuine 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 one of the contact people in paragraph 5.2 immediately. If the matter is not remedied, you should raise it formally using our grievance procedure.
- 11.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

12.0 Review of the policy

- 12.1 This policy is reviewed annually by the board of trustees. We will monitor the application and outcomes of this policy to ensure it is working effectively.

13.0 Contacts

Governance professional (clerk to the board of trustees)	Kathryn Berrill (Head of Governance) kberrill@dixonsat.com
Principal	Contact relevant academy
Chair of audit and risk committee	Whistleblowing@dixonsat.com
Trust's external auditors	Contact through Amanda Sleney, (Finance Director) ASleney@dixonsat.com
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Email: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk
The NSPCC whistleblowing helpline	Helpline: 0808 800 5000 Email: help@nspcc.org.uk

