



**CARLTON**  
ACADEMY TRUST

## **Whistleblowing Policy**

**Approved on behalf of Trustees:**

**Gareth Logan**

**Date:**

**July 2023**

**Next Review date:**

**July 2024**



## **Policy Aims and Scope**

This policy sets out the framework for employees to confidentially raise serious concerns without fear of reprisal, victimisation, or harassment. Its provisions apply to all staff, Trustees, volunteers, and contractors.

## **Responsibilities of Staff**

To maintain high standards of conduct and operation, any member of staff with serious concerns should come forward and disclose them.

In recognition of the importance of their roles, all senior Trust and school leaders have a positive duty to come forward and report any concerns. This includes all school-based staff who are part of the senior leadership team, or any member of the Central Trust team from Director level upwards. If they fail to do so, they **will** be subject to disciplinary action.

## **Types of Concern**

Concerns raised commonly include (non-exhaustive list):

- Criminal offence
- Significant breach of Trust procedures or practice.
- Actions contrary to the philosophies or culture of the Trust.
- Actions intended to undermine the profile or confidence of others within the Trust.
- Breach of legal obligations.
- Miscarriage of justice.
- Mistreatment, abuse, or unethical conduct.
- Financial malpractice, fraud, corruption, or unauthorised use of public funds.
- Pollution or damage to the environment.

## **Disclosures and Investigations**

Disclosures should be made to the following Trust personnel:

**Head of School:** For disclosures relating to staff within their school.

**Trust CEO:** For disclosures relating to a Head of School or Central Trust personnel.

**Chair of Trustees:** For disclosures relating to the CEO, governors, or other Trustees

**Vice-Chair of Trustees:** For disclosures relating to the Chair of Trustees

Where staff are unsure whether to raise a concern, the advice is **to always raise it**. Once disclosed, investigations will be conducted fairly and objectively and protect those making disclosures in good faith. The Trust will not tolerate any resultant harassment or victimisation, which will be treated as a serious disciplinary offence.

## **Keeping Whistleblowers Informed**

The school/Trust will formally acknowledge disclosures within 10 working days, summarising concerns and how they will be managed. Where an investigation is required, they will be advised of the nature and estimated length, and confirmation that a union representative/independent person can support them.



The school/Trust will also appoint a named person who will keep the staff member informed throughout, who will adhere to strict confidentiality guidelines.

### **Anonymous Allegations**

Anonymous allegations are more difficult to investigate as there is no one to refer to for further details or clarification. For this reason, we would encourage those making anonymous allegations to do this via their trade union (where relevant), enabling them to register their complaint whilst maintaining anonymity.

### **False Allegations**

Disciplinary action may be taken against employees who make malicious or vexatious allegations. No action will ever be taken against employees making disclosures in good faith.

### **External Disclosures**

Where whistleblowers feel an internal process hasn't adequately addressed their concerns, they can register their concerns with one or more external agencies. These commonly include:

- Charity Commissioners for England and Wales
- Children's Commissioner
- OFSTED
- Regional Schools Commissioner
- Environment Agency
- Health and Safety Executive
- Information Commissioner's Office
- Education and Skills Funding Agency

In making an external disclosure, whistleblowers should take care not to disclose confidential or privileged information, which includes:

- Information that would enable a child to be identified.
- Commercially sensitive information.
- Third party personal financial information.
- Information that is held as part of court proceedings where the information has not been made public.

### **Record Keeping**

Secure confidential records of all whistleblowing disclosures and investigations will be retained by the Trust for a period of at least five years.

