

Whistleblowing Policy

Published: May 2020

Review: May 2022

Jesus grew in wisdom and stature

OUR TRUST PRAYER

We thank you, God of Love, for the gift of children,
bless the work of our Trust, that in all we do
young people may grow in wisdom and stature,
and so come
to know you,
to love you
and to serve you
as Jesus did.

We make our prayer in his name who is God
with you and the Holy Spirit, now and forever.

Amen

Contents

1.	Our Mission	3
2.	Introduction.....	3
3.	Scope	3
4.	Definitions	4
5.	Raising a Whistleblowing Concern	4
6.	Confidentiality	5
7.	External Disclosures.....	6
8.	Investigation and Outcome	6
9.	Protection and Support for Whistle-Blowers	7
10.	Responsibility for the Success of this Policy.....	7
	Appendix 1 – Contacts	9

1. Our Mission

- 1.1. To create a Trust in which our schools will thrive under the leadership of Headteachers, supported and challenged by local governing bodies and accountable to the board of trustees.
- 1.2. We will achieve this by living our values of:
 - Collaboration
 - Valuing the Local
 - Valuing Difference
 - Inclusion
- 1.3. We want to ensure that all our children to flourish and reach their full potential, within the explicit Christian culture of our schools.

2. Introduction

- 2.1. We are committed to the highest possible standards of honesty and integrity and we expect all staff to reflect these standards. A culture of openness and accountability is essential in order to achieve these standards. There may be, however, times when there is unethical, negligent, or illegal conduct taking place without knowledge of Liverpool Diocesan Schools Trust (LDST).
- 2.2. This policy provides the basis on which this type of unacceptable conduct can be reported and be addressed.

3. Scope

- 3.1. 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
 - Provide staff with guidance as to how to raise those concerns
 - Reassure staff that they should be able to raise genuine concerns in the public interest without fear of victimisation, subsequent discrimination or disadvantage, even if they turn out to be mistaken.
- 3.2. This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.
- 3.3. This policy applies to all individuals working at all levels of the organisation; governors, directors, employees, consultants, contractors, trainees, homeworkers, part-time workers, fixed-term workers, volunteers, casual workers, agency staff (collectively referred to as staff in this policy).

4. Definitions

- 4.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include, but is not limited to:
- Criminal activity
 - Miscarriages of justice
 - Danger to health and safety
 - Damage to the environment
 - Failure to comply with any legal or professional obligation regulatory requirements
 - Bribery
 - Financial fraud or mismanagement
 - Negligence
 - Breach of our internal policies and procedures
 - Conduct likely to damage our reputation
 - Unauthorised disclosure of confidential information
 - The deliberate concealment of any of the above matters.
- 4.2. A whistle-blower is a person who raises a genuine concern in the public interest relating to any of the above. 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.
- 4.3. 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 LDST Grievance Policy.
- 4.4. If staff are unsure whether something is within scope of this policy, you should seek advice from Human Resources.

5. Raising a Whistleblowing Concern

- 5.1. In the majority of cases where staff have a concern it would be appropriate to raise this with their line manager. Staff may tell them in person or put the matter in writing if they prefer. Where a line manager is verbally informed they will share a written note of the conversation with the employee. They may be able to agree a way of resolving the staff members concern quickly and effectively.

- 5.2. The line manager may refer the matter to the Headteacher, Chair of Governors or a member of the LDST Executive Team if they consider it appropriate and proportionate.
- 5.3. However, there be situations where staff do not feel it is appropriate to approach their line manager. Examples include, but are not limited to; where staff consider the matter too serious, or where their line manager has not addressed their concern.
- 5.4. If a situation in accordance with 5.3 arises then staff should raise their concern with one of the following, contacts for whom can be found in Appendix 1:
 - Deputy Headteacher
 - Headteacher
 - The Chair of Governors
 - The Trust Education Officer
 - The Chief Executive Officer
- 5.5. A meeting will be raised with the whistle-blower as soon as reasonably possibly to discuss your concern.
- 5.6. The whistle-blower may bring a colleague or union representative to any meeting conducted under this policy. Any companion or representative must respect the confidentiality of the disclosure and any subsequent investigation.
- 5.7. A written summary of the whistle-blowers concern will be made at the meeting and they will be provided with a copy after the meeting. An indication of how it is proposed to deal with the matter will also be provided.

6. Confidentiality

- 6.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy.
- 6.2. If you want to raise your concern confidentially we will make every effort to keep your identity secret. If it is necessary for anyone investigation your concern to know your identity, we will discuss this with you.
- 6.3. There may be situations where despite all reasonable efforts, it is not possible to keep the whistle-blowers identity secret. For example, where the subject of a whistleblowing concern can deduce an identity from who witnesses/was aware of the reported incident.
- 6.4. 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 and have been made in the public interest. Therefore, LDST does not encourage staff to make disclosures anonymously.
- 6.5. Anonymous complaints will be investigated as far as reasonably possible.

- 6.6. Whistle blowers who are concerned about possible reprisals (be it victimisation, discrimination or disadvantage) if their identity is revealed should come forward to the Head Teacher, Trust Education Officer or one of the other contact points. Reasonable measures can then be taken to preserve confidentiality.
- 6.7. If a criminal offence has occurred, we may be required to report the matter to the relevant authorities. If such a situation concerns we will discuss with you how we can protect you.
- 6.8. If you are in any doubt you can seek advice from [Public Concern at Work](#) who operate a confidential helpline – 020 7404 6609, or from your trade union representative.

7. External Disclosures

- 7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying and wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.
- 7.2. The law recognises that in some cases it may be appropriate for your to report your concerns to an external body, such as a regulator.
- 7.3. It will rarely, if ever, be appropriate to alert the media.
- 7.4. We strongly encourage staff to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, [Public Concern at Work](#), operates a confidential helpline – 020 7404 6609. They also have a list of prescribed regulators for reporting certain types of concern. Staff may also seek advice from their trade union representative.
- 7.5. A list of prescribed regulators is also available from the governments website by accessing this [link](#).
- 7.6. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. Examples include, but are not limited to; a supplier, a service provider, or a contractor.
- 7.7. The law allows you to raise a concern in the public interest with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage staff to report such concerns internally first.

8. Investigation and Outcome

- 8.1. Once the whistle-blower has raised a concern an initial assessment will be undertaken to determine the scope of any investigation.
- 8.2. LDST cannot guarantee the outcome the whistle-blower initially seeks will be achieved. However, we are committed to dealing with all concerns fairly and reasonably. Engaging with this policy will support LDST in achieving this.
- 8.3. The whistle-blower will be informed of the outcome of the assessment.

- 8.4. The whistle-blower may be required to attend additional meetings in order to provide further information. In some cases, an investigator, or team of investigators may be appointed. Examples of where this may be appropriate include, but are not limited to; where relevant experience of investigations is required, or where specialist knowledge of the subject matter is required.
- 8.5. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing. Recommendations may also be made for further action in accordance with the LDST Disciplinary Policy.
- 8.6. The person the whistle-blower raised their concern with will aim to keep the whistle-blower informed of the progress of the investigation and its likely timescale.
- 8.7. Any information shared with the whistle-blower must be treated as confidential.
- 8.8. The need for confidentiality may prevent giving the whistle-blower specific details of the investigation or any disciplinary action taken as a result.
- 8.9. If it is concluded that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to investigation and a disciplinary penalty in accordance with the LDST Disciplinary Policy.
- 8.10. If the whistle-blower is not happy with the way in which their concern has been handled, they may contact; the Trust Education Officer, The Chief Executive Officer, or the LDST Board of Directors.

9. Protection and Support for Whistle-Blowers

- 9.1. LDST recognises and understands that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in the public interest under this policy, even if they turn out to be mistaken.
- 9.2. Staff will not suffer any detrimental treatment as a result of raising a concern in the public interest.
- 9.3. Detrimental treatment includes, but is not limited to; dismissal, disciplinary action, threats, unfavourable treatment from the employer or co-workers connected with raising the concern.
- 9.4. If a whistle-blower feels they have suffered any detrimental treatment they should inform the Headteacher or HR Director immediately. Staff may also see advice and support from their trade union representative.

10. Responsibility for the Success of this Policy

- 10.1. The LDST Board of Directors has overall responsibility for this policy. Including legally and operationally, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

- 10.2. The Headteacher (Trust Education Officer for Head Office) has day to day operational responsibility for this policy, and must ensure all appropriate staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 10.3. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.
- 10.4. 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 or the LDST Board of Directors.

Appendix 1 – Contacts

Name of School	Insert
Deputy Headteacher	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
Headteacher	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
Chair of Governors	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
HR	Name: Sarah Whittaker, Head of HR Telephone: 01925 443871 E-mail: sarah.whittaker@warrington.gov.uk Address: 4 th Floor, Quattro Tower, Buttermarket Street, Warrington, WA1 2NJ Name: Helen Fleming, Senior HR Manager Telephone: 01925 442947 E-mail: h Fleming@warrington.gov.uk Address: 4 th Floor, Quattro Tower, Buttermarket Street, Warrington, WA1 2NJ
Trust Director of Education	Name: Paul Stanley Telephone: 0151 705 2175 E-mail: paul.stanley@ldst.org.uk Address: St James House, 20 St James Street, Liverpool, L1 7BY
Director of Finance and Operation	Name: Steve Boothroyd Telephone: 0151 705 2175 E-mail: steve.boothroyd@ldst.org.uk Address: St James House, 20 St James Street, Liverpool, L1 7BY
Chief Executive Officer	Name: Laurie Kwissa Telephone: 0151 705 2175 E-mail: laurie.kwissa@ldst.org.uk Address: St James House, 20 St James Street, Liverpool, L1 7BY
Chair of the Board of Directors	Name: Stuart Harrison E-mail: stuart.harrison@liverpool.anglican.org Address: C/O St James House, 20 St James Street, Liverpool, L1 7BY

Vice Chair of the Board of Directors	Name: Canon Margaret Swinson E-mail: maggie.swinson@ldst.org.uk Address: C/O St James House, 20 St James Street, Liverpool, L1 7BY
Public Concern at Work (Independent Whistleblowing Charity)	Helpline: 020 7404 6609 Email: whistle@pcaw.co.uk Website: www.pcaw.co.uk