

Whistleblowing Policy

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Learn, Love and Achieve, Together with Jesus

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 THE CHURCH
OF ENGLAND

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

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1. Our Mission

- 1.2 Working together with our school communities, provide an excellent education and life-enhancing relationships with the Christian faith and Jesus Christ.

We do this through:

- 1.3 Being a family of schools that is committed to well-being and supporting each other, so that all children, learners and staff across our Trust, flourish.
- 1.4 Connecting with each other to share practice and provide an excellent education that is built on distinctly Christian values.
- 1.5 A commitment to inclusion, ensuring that all learners thrive through an education that teaches wisdom, instils hope, nurtures community and embeds dignity and respect.
- 1.6 Strong bonds of collaboration, innovative approaches to education and a shared purpose amongst schools, families and communities.

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, in line with the Trust's Christian values. The Trust recognises that 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 Government [Whistleblowing Guidance for Employers and Code of Practice](#).

- 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 (referred to as “staff member”, “member of staff” or “the whistle-blower” in this policy).
- 3.4. If a member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of The Trust’s activities, (a whistleblowing concern) they should report it under this policy.

4. Definitions

- 4.1. Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).
- 4.2. Whistleblowing is the term used when a staff member passes on information concerning wrongdoing. This can be called “making a disclosure” or “blowing the whistle”.
- 4.3. The reported wrongdoing will typically (although not necessarily) be something that the member of staff has witnessed at work.
- 4.4. To be covered by whistleblowing law, the staff member who makes a disclosure must believe that they are acting in the public interest.
- 4.5. This policy should not be used for complaints relating to one’s own personal circumstances, such as the way a member of staff has been treated at work. In those cases, the LDST Grievance Policy would apply.
- 4.6. The staff member must also reasonably believe that the disclosure shows past, present or likely future wrongdoing falling into one or more of the following categories:
 - criminal offences (this may include, for example, types of financial impropriety such as fraud)
 - failure to comply with an obligation set out in law
 - miscarriages of justice
 - endangering of someone’s health and safety
 - damage to the environment
 - covering up wrongdoing in the above categories
- 4.7. If a staff member is unsure whether something is within scope of this policy, advice should be sought from the Trust Human Resources Lead.

5. Raising a Whistleblowing Concern

- 5.1. In the majority of cases where a staff member has a concern it would be appropriate to raise this with their manager. The member of staff may tell them in person or put the matter in writing if they prefer. Where a manager is verbally informed, they will share a written note of the conversation with the staff member. They may be able to agree a way of resolving the staff members concern quickly and effectively.
- 5.2. The 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, it is recognised that there may be situations where a member of staff does not feel it is appropriate to approach their direct manager. Examples include but, are not limited to; where the staff member considers the matter to be too serious, or where their line manager has not addressed their concern previously.
- 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 arranged with the whistle-blower as soon as reasonably possibly to discuss their concern(s).
- 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. Staff members will be supported to voice whistleblowing concerns openly under this policy.
- 6.2. If a member of staff wishes to raise a concern confidentially, The Trust will make every effort to protect the information about their identity. If it is necessary for anyone who is investigating the concern to know the staff member's identity, this will be discussed with them.
- 6.3. There may be situations where, despite all reasonable efforts, it is not possible to protect the whistle-blower's identity. For example, where the subject of a whistleblowing concern can deduce an identity from who has witnessed/was aware of the reported incident.
- 6.4. Proper investigation may be more difficult or not possible, where further information cannot be obtained. It may also be more difficult to establish whether any allegations are credible and have been made in the public interest. Therefore, members of staff are encouraged not to raise concerns anonymously, wherever possible.
- 6.5. Anonymous complaints will be investigated as far as reasonably practicable.
- 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 will then be taken to preserve confidentiality.
- 6.7. If a criminal offence has occurred, The Trust is required to report the matter to the relevant authorities. If such a situation arises, this will be discussed with the Whistle-blower.
- 6.8. If needed, members of staff can seek advice from [Protect](#) who operate a confidential helpline – 020 3117 2520 and contact service, or from their trade union, particularly if external disclosure is being considered.

7. External Disclosures

- 7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying whistleblowing concerns, within the workplace. In most cases, staff members should not find it necessary to alert anyone externally.
- 7.2. In some cases, there may be a legal duty for staff members to report concerns to an external body. However, staff are encouraged to report such concerns within the Trust first, wherever possible. A list of prescribed regulators is also available from the governments website by accessing this [link](#).

- 7.3. The Trust's position is that members of staff should not inform the media of any concerns pertaining to whistle-blowing, as this could potentially compromise the confidentiality and wellbeing of those involved.
- 7.4. Whistleblowing concerns would usually relate to the conduct of LDST 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.
- 7.5. Members of staff can raise a concern in the public interest with a third party, where they reasonably believe that it relates mainly to the third party's actions or something that is legally the third party's responsibility. However, staff are encouraged to report such concerns within the Trust first, wherever possible.

8. Investigation and Outcome

- 8.1. Once a whistle-blower has raised a concern, an initial assessment will be undertaken to determine the scope of any investigation.
- 8.2. The whistle-blower will generally be informed of the outcome of the assessment, although there may be some specific cases where this is not appropriate.
- 8.3. 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.
- 8.4. The investigator(s) may make recommendations for change to enable the Trust to minimise future risk. Recommendations may also be made for further action in accordance with the LDST Disciplinary Policy.
- 8.5. The whistle-blower will be kept informed of the progress of the investigation and its likely timescale, where appropriate.
- 8.6. Any information shared with the whistle-blower must be treated as confidential.
- 8.7. The need for confidentiality may prevent the sharing of specific details regarding the investigation, or any disciplinary action taken as a result.
- 8.8. If it is concluded that a whistle-blower has made false allegations, either maliciously or with a view to personal gain, the whistle-blower may be subject to investigation and a disciplinary action in accordance with the LDST Disciplinary Policy.

- 8.9. 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 to discuss their concerns.

9. Protection and Support for Whistle-Blowers

- 9.1. LDST recognises and understands that whistle-blowers may be concerned about possible repercussions. The Trust encourages 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 such as dismissal, disciplinary action, threats, or unfavourable treatment from the employer or co-workers.
- 9.3. If a whistle-blower feels they have suffered any detrimental treatment they should inform their Headteacher or the Trust HR Lead 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. Each Headteacher has day to day operational responsibility for this policy within their school, (the Trust Education Officer for Head Office) and must ensure all staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected risk or wrongdoing as per the definition stated earlier within this policy.

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: Nicola Kettley Telephone: 07788 3391 217 E-mail: nicola.kettley@ldst.org.uk Address: St James House, 20 St James Street, Liverpool, L1 7BY
Trust Director of Education	Name: Sally Aspinwall Telephone: 0151 705 2175 E-mail: s.aspinwall@ldst.org.uk Address: St James House, 20 St James Street, Liverpool, L1 7BY
Director of Finance and Operations	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: 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
Protect (Independent Whistleblowing Charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/