



WHISTLEBLOWING POLICY

This is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	October 2022
This policy must be reviewed by no later than*: <i>*This refers to the term in which the Policy must be reviewed by the appropriate Committee for recommendation to the Board.</i>	Autumn 2024
Policy Author(s):	Human Resources
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Date Policy approved by the Trust Board and Minute reference	7 December 2022
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WHISTLEBLOWING POLICY

1. About this policy

- 1.1 Avanti Schools Trust (“the Trust”) is committed to running our academies with honesty and integrity and we expect all staff to maintain high standards. 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 and to address them when they do occur.
- 1.2 This policy applies to all employees, officers, consultants, contractors, casual workers and agency workers (“staff”).
- 1.3 The aims of this policy are to:
- (a) Encourage staff to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously, investigated as appropriate, and that their confidentiality will be respected;
 - (b) Provide staff with guidance as to how to raise concerns;
 - (c) Reassure staff that they can raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.
 - (d) This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is whistleblowing?

- 2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include, but is not limited to:
- (a) Criminal activity;
 - (b) Failure to comply with any legal or professional obligation or regulatory requirements;
 - (c) Child protection or safeguarding concerns;
 - (d) Miscarriages of justice;
 - (e) Danger to health and safety;
 - (f) Damage to the environment;
 - (g) Financial fraud or mismanagement;
 - (h) Negligence;
 - (i) Accepting bribes;
 - (j) Breaching the principles of public office (‘Nolan Principles’);

- (k) Any unlawful conduct likely to damage the Trust's reputation;
 - (l) Unauthorised disclosure of confidential information; or
 - (m) The deliberate concealment of any of the above matters.
 - (n) A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Trust's activities, you should report it under this policy.
- 2.2 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 Policy and Procedure or Anti-harassment and Bullying Policy as appropriate.
- 2.3 If you are uncertain whether something is within the scope of this policy you should seek advice from the Head of HR, whose contact details are at the end of this policy.

3. Raising a whistleblowing concern

- 3.1 The Trust hopes that in many cases you will be able to raise any concerns with your line manager or Principal. You may tell them in person or by putting the matter in writing if you prefer. They may be able to agree to a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Trustees.
- 3.2 However, where the matter is more serious, relates to your line manager, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reasons, should contact one of the following:
- (a) The Head of HR
 - (b) The Chief Financial Officer
 - (c) The CEO
 - (d) The Chair of the Board of Trustees

Contact details are set out at the end of this policy.

- 3.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 3.4 The Trust will take down a written summary of the concern raised and provide you with a copy as soon as practicable after the meeting. The Trust will also aim to give you an indication of how we propose to deal with the matter.

4. Confidentiality

- 4.1 The Trust's aim is to create a culture where 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 first.
- 4.2 The Trust does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Trust cannot obtain further information. It is also more difficult or impossible to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contact points listed above in Paragraph 3.2 and appropriate measures can be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

5. Investigation and outcome

- 5.1 Once you have raised a concern, the Trust will carry out an initial assessment to determine the scope of any investigation. The Trust will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 5.2 In some cases, the Trust may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing
- 5.3 The Trust will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 5.4 If the Trust concludes that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.
- 5.5 While 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.
- 5.6 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 3.2.

6. External disclosures

- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 6.2 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. The Trust strongly encourages you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- 6.3 Whistleblowing concerns usually relate to the conduct of the Trust's staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy. You should contact one of the other individuals set out in *Paragraph 3.2* for guidance.

7. Protection and support for whistleblowers

- 7.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The Trust aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 7.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a 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 your manager / Principal immediately. If the matter is not remedied you should raise it formally with the Trust's Grievance Policy and Procedure.
- 7.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

8. Contacts

Head of HR	<i>TBC</i>
Chief Financial Officer	<i>Kirit Patel</i> <i>kpatel@avanti.org.uk</i>
CEO	<i>Nitesh Gor</i> <i>ngor@avanti.org.uk</i>
Chair of the Board of Trustees	<i>Mike Younger</i> <i>my.asttrustee@avanti.org.uk</i>
Public Concern at Work	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk