



Whistleblowing Policy

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2.0	2019 - 2020	Reviewed and Updated the Board	Bev Owens	Approved
3.0	19/07/2021	New Template	Bev Owens	Approved
4.0	14/02/2022	Updated sections 4.2 & 10 to reflect changes in the Board of Directors	Lisa-Marie McGrath	Approved
5.0	19/01/2023	Updated sections 4.2 & 10 to reflect changes in the Board of Directors	Lisa-Marie McGrath	Approved
6.0	22/01/2024	Contact details for Public Concern at Work updated	Lisa-Marie McGrath	Approved

Whistleblowing Policy

1. ABOUT THIS POLICY

1.1 We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of going wrong occasionally or unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations from occurring and address them when they do occur.

1.2 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.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy covers all employees, volunteers, interns, casual, and agency workers.

2. PERSONNEL RESPONSIBLE FOR THE POLICY

2.1 The board is responsible for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 In conjunction with the board and the Trade Unions, the Whistleblowing Officer should review this policy from a legal and operational perspective at least once a year.

2.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways to improve it. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

3. WHAT IS WHISTLEBLOWING?

3.1 **Whistleblowing** is the disclosure of information related to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery under our Anti-corruption and Bribery Policy;
- facilitating tax evasion contrary to our Anti-facilitation of tax evasion policy;
- financial fraud or mismanagement;
- breach of our internal policies and procedures, including our Code of Conduct;
- conduct likely to damage our reputation or financial well-being;
- unauthorised disclosure of confidential information;
- negligence;
- the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. You should report it under this policy if you have any genuine concerns about suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern).

3.3 This policy should not be used for complaints about your circumstances, such as how you have been treated at work. Instead, you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate in those cases.

3.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

4.1 We hope you will be able to raise any concerns with your Line Manager/SLT in many cases. You may tell them in person or put 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 Whistleblowing Officer.

4.2 However, where the matter is more serious, or you feel that your Line Manager/SLT has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- The Whistleblowing Officer, Paul Eckley;
- The Trust Board; Stephanie Capon, Trustee;

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

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.4 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.

5. CONFIDENTIALITY

5.1 We hope that staff can 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.

5.2 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. However, whistleblowers concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 4, and appropriate measures can then be taken to preserve confidentiality. If you doubt, you can seek advice from our confidential counselling hotline or Protect, the independent whistleblowing charity that offers a confidential helpline. Their contact details are at the end of this policy.

6. INVESTIGATION AND OUTCOME

- 6.1 Once you have raised a concern, we will conduct 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 to provide further information.
- 6.2 In some cases, we may appoint an investigator or team of investigators, including staff with relevant investigations experience or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to minimise the risk of future wrongdoing.
- 6.3 We 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 from giving you specific details of the investigation or any disciplinary action taken as a result. Therefore, you should treat any information about the investigation as confidential.
- 6.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

7. IF YOU ARE NOT SATISFIED

- 7.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and appropriately. However, by using this policy, you can help us achieve this.
- 7.2 If you are unhappy with how your concern has been handled, you can raise it with one of the other key contacts in paragraph 4. Alternatively, you may contact the board of directors chairman or our external auditors. Contact details are set out at the end of this policy.

8. EXTERNAL DISCLOSURES

- 8.1 This policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. Therefore, you should not find it necessary to alert anyone externally in most cases.
- 8.2 The law recognises that it may be appropriate for you to report your concerns to an external body such as a regulator in some circumstances. However, 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. The independent whistleblowing charity, Protect operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns. Their contact details are at the end of this policy.

- 8.3 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 customer, supplier or service provider. In some circumstances, the law will protect you if you directly raise the matter with a third party. However, we encourage you to report such concerns internally first. You should contact your Line Manager/SLT or one of the other individuals set out in paragraph 4 for guidance.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 Understandably, whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and support staff who raise genuine concerns under this policy, even if they are mistaken.
- 9.2 Whistleblowers must not suffer any detrimental treatment due to raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should immediately inform the whistleblowing officer. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 9.3 You must not threaten or retaliate against whistleblowers in any way. You may be subject to disciplinary action if involved in such conduct. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 9.4 A confidential support and counselling hotline is available to whistleblowers who raise concerns under this policy. Their contact details are set out at the end of this policy.

10. CONTACTS

Whistleblowing Officer/Head of Safeguarding	Paul Eckley 0161 532 3250 pauleckley@thesovereigntrust.uk
Chairperson of the Board of Directors	Eddie Austin eddieaustin@thesovereigntrust.uk
The Trust Board	Stephanie Capon stephaniecapon@thesovereigntrust.uk

Confidential counselling hotline (24 hours a day)	<p>Pam Assist</p> <p>0800 882 4102</p> <p>www.pamassist.co.uk</p> <p>Username: TRAFwell</p> <p>Password: TRAFwell</p>
Public Concern at Work (Independent whistleblowing charity)	<p>Helpline: 020 7404 6609</p> <p>E-mail: whistle@pcaw.co.uk</p> <p>Website: www.pcaw.co.uk</p>

