



**SARACENS**  
**MULTI-ACADEMY**  
**TRUST**

## CONFIDENTIAL REPORTING (WHISTLEBLOWING) CODE

Approved by Board: 5<sup>th</sup> October 2022

To be reviewed: October 2025

## Contents

1. Introduction.....	3
2. Purpose .....	3
3. Scope.....	4
4. Procedure for Making a Disclosure .....	5
4.1. Introduction .....	5
4.2. Confidentiality.....	5
4.3. Anonymous Disclosures.....	5
4.4. Untrue Disclosures.....	6
4.5. Employee Action .....	6
4.6. Action Taken by the Trust.....	6
4.7. How the Matter Can Be Taken Further .....	7
5. Monitoring arrangements .....	8
6. Links with other policies .....	8

## 1. Introduction

- 1.1. Confidential reporting is the disclosure or communication of information about possible wrongdoing by individuals or organisations. Disclosure can be either internal within the organisation or external to an outside authority.
- 1.2. This confidential reporting code is intended to enable employees and volunteers to disclose information about wrongdoing internally and to provide employees and volunteers with protection from subsequent victimisation, discrimination or disadvantage. This will assist in detecting and deterring wrongdoing and, by demonstrating the Trust's accountability, maintain public confidence and the Saracens Multi-Academy Trust and Schools' good reputation.

## 2. Purpose

- 2.1. Employees and volunteers are often the first to realise that there may be evidence of wrongdoing within a school or Trust. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Trust. They may also fear harassment or victimisation.
- 2.2. In line with the Trust's commitment to high standards of openness, integrity and accountability, Saracens Multi-Academy Trust expects employees and volunteers who have a reasonable belief that wrongdoing is taking place within the Trust or its schools to come forward and voice those concerns internally. This may be an awareness of suspected irregularity, wrongdoing or a failure of standards. This code provides the means for employees and volunteers to make such disclosures.
- 2.3. An employee's concerns about wrongdoing may include a reasonable belief that one or more of the following has occurred or is likely to occur:
  - Conduct which is an offence or a breach of law,
  - Miscarriages of justice,
  - Health and safety risks, including risks to the public as well as other employees, pupils and volunteers,
  - The unauthorised use of public funds,
  - Fraud and corruption,
  - Sexual or Physical abuse of pupils,
  - Other unethical conduct.
- 2.4. Under this code employees and volunteers should make disclosures about possible wrongdoing to:
  - In relation to a Trust School, the Principal of that school
  - In relation to Trust Central Services, the Trust CEO
  - Where this is inappropriate, the Chairman of Trustees.

It is recognised that most cases will have to proceed on a confidential basis.

2.5. It is in the interests of all parties that disclosures are dealt with properly, quickly and discreetly. The overriding consideration for the Trust and the employee is that it would be in the public interest for any wrongdoing found to be corrected and, where appropriate, sanctions applied.

2.6. The code provides employees and volunteers with a procedure to make disclosures of irregularity or wrongdoing without fear of adverse treatment as a result. The Trust will not tolerate any harassment or victimisation of employees and volunteers making disclosures (including informal pressures) and will take action to protect employees and volunteers when they make a disclosure in good faith.

2.7. The code addresses major concerns that fall outside the scope of other procedures and where the interests of others or of the Trust are at risk. It has been developed within the following legislative and policy framework:

2.8. It takes into account the requirements of the Public Interest Disclosure Act 1998.

2.9. It is complementary to the Trust's Codes of Conduct for Trustees, Governors and Staff which make clear the standards of propriety and good practice expected of Trustees, Governors, employees and volunteers.

2.10. It is complementary to the Trust's Discipline and Grievance Policies. Together they form a framework which allows employees to be disciplined, to seek personal redress, to raise personal complaint and to disclose wrongdoing where appropriate.

2.11. The code is in addition to the Trust's complaints procedures and other reporting procedures, for example child protection and safeguarding procedures.

2.12. For clarity, this Code is written in the second person singular. i.e. "you". For the purposes of this Code, "you" means the person making a protected disclosure.

### **3. Scope**

3.1 This code applies to all employees and volunteers in the Trust. It is also applicable to:

- contractors working for the Trust on Trust premises, for example, agency staff and cleaners
- suppliers and those providing services under a contract with the Trust in their own premises.

## **4. Procedure for Making a Disclosure**

### **4.1. Introduction**

4.1.1. This code provides you with a procedure for making disclosures internally about suspected wrongdoing, irregularity or a failure of standards within the Trust. Its aims are:

- To encourage you to feel confident in raising serious concerns and to question and act upon concerns about possible wrongdoing within the Trust.
- To provide a means for you to disclose those concerns and receive feedback on any action taken.
- To ensure that you receive a response to your concerns and that you are aware of how to pursue them further if you are not satisfied.
- To reassure you that you will be protected from possible reprisals or victimisation and from subsequent discrimination or disadvantage.

4.1.2. Any serious concerns that you have about an aspect of service provision or the conduct of employees, volunteers, governors or trustees of the Trust or others acting on behalf of the Trust can be reported under this code. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Trust subscribes to.
- is against the Trust's or schools' policies.
- falls below established standards of practice.
- amounts to improper conduct.

Examples of these are given in paragraph 2.3.

### **4.2. Confidentiality**

4.2.1. All disclosures will be treated in confidence and wherever possible, every effort will be made not to reveal your identity. However, you may need to come forward as a witness and you will be given every support from management at that time.

### **4.3. Anonymous Disclosures**

4.3.1. You should put your name to your disclosure whenever possible. Disclosures made anonymously will still be considered at the discretion of the Trust. However, it is helpful to have your name in case further information is required.

4.3.2. In exercising its discretion, the Trust will take into account:

- the seriousness of the issues raised.
- the credibility of the disclosure.
- the likelihood of confirming what is alleged from attributable sources.

#### **4.4. Untrue Disclosures**

If you make a disclosure in good faith that you reasonably believe is in the public interest, but it is not confirmed by the investigation, no action will be taken against you. If however, your allegation is frivolous, malicious or for personal gain, you may be subject to disciplinary action.

#### **4.5. Employee Action**

4.5.1. As a first step, you should normally raise your concerns with your Manager. If you believe your Manager is involved, you should approach the Principal of the school or CEO of the Trust. This depends however, on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. If you believe that the CEO and/or Chairman of Trustees are involved, you should contact the other Trustees.

4.5.2. You may raise your concern either verbally or in writing. The earlier you express the concern, the easier it is to take action. You should provide:

- details of your concerns, including the nature, dates and location of any relevant incidents.
- reasons why you feel concerned about the situation.

4.5.3. Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

4.5.4. You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. You may also discuss your concerns with your trade union representative.

4.5.5. You may invite your trade union or other representative to be present during any meetings or interviews in connection with the concerns you have raised.

4.5.6. The amount of contact between you and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Trust will seek further information from you.

#### **4.6. Action Taken by the Trust**

4.6.1. The Trust will respond to your disclosure. Where appropriate, the matters raised may be:

- a) investigated by management, or through the disciplinary process;
- b) referred to the Police;
- c) referred to an independent examiner

d) the subject of an independent inquiry.

4.6.2. In order to protect individuals and those accused of possible wrongdoing, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The over-riding principle the Trust will have in mind is the public interest. Disclosures for which there are other specific procedures (for example, grievance, safeguarding/child protection or discrimination issues) will normally be referred for consideration under those procedures.

4.6.3. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any action investigation is conducted.

4.6.4. Within 10 working days of a concern being raised, you will receive a response:

- a) acknowledging that the concern has been received;
- b) telling you whether any initial enquiries have been made;
- c) indicating how the matter is going to be dealt with;
- d) giving an estimate of how long it will take to provide a final response;
- e) supplying you with information on staff support mechanisms;
- f) telling you why if there is to be no further investigation.

4.6.5. The Trust will take steps to minimise any difficulties you may experience as a result of making a disclosure. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Trust will arrange for you to receive advice about the procedure.

4.6.5 You will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcomes of any investigation.

## **4.7. How the Matter Can Be Taken Further**

4.7.1. This code is intended to provide you with a route within the Trust to make disclosures of wrongdoing. The Trust hopes you will be satisfied with any action taken. If you are not, and you believe the information you have disclosed is substantially true, possible contact points are:

- Public Concern at Work
- Your trade union
- Your local Citizens Advice
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- The Police

4.7.2. If you do take the matter outside the Trust, you should ensure that you do not disclose confidential information. Check with the person dealing with your disclosure within the Trust before divulging any information.

## **5. Monitoring arrangements**

After September 2020, this policy will be reviewed every 2 years, but can be revised as needed.

This policy will be approved by the Board of Trustees.

## **6. Links with other policies**

This policy links with the Trust's policies on:

Staff Code of Conduct

Governor Code of Conduct

Trustee Code of Conduct

Staff Capability Procedure

Staff Disciplinary Procedures

Staff Grievance Procedures

Child Protection and Safeguarding Policy

Procedure for Investigating Allegations of Abuse Against Staff and Volunteers

Procedure for Investigating Allegations of Child on Child Abuse

ICT Acceptable Use Agreement