CONNECT
MULTI-ACADEMY TRUST

Whistleblowing Policy

Policy Owner	Chief Operating Officer
Review Frequency	Annual

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1. Policy Statement

1.1 ConNEct Multi Academy Trust (The Trust) is committed to the highest possible standards of openness, honesty, integrity and accountability. As part of this commitment the Trust is keen that activity, which falls below these standards, is reported in order that it can be dealt with promptly. We encourage staff, volunteers, contractors and stakeholders to raise genuine concerns about wrongdoing in the public interest without fear of reprisal.

1.2 The Trust acknowledges that employees are often the first to realise that there may be something seriously wrong within their organisation and that the Trust needs to encourage employees and other workers with concerns about any aspect of the Trust's work to come forward and voice those concerns.

1.3 The Trust has this Whistleblowing Policy to enable employees to raise their concerns about malpractice at an early stage and in the right way. The Trust would prefer staff to raise matters when it is just a concern rather than wait for proof. The Whistleblowing Policy is intended to encourage and enable employees, to raise serious concerns within the Trust rather than overlooking a problem or simply reporting it outside.

1.4 If something is troubling employees, which they think the Trust should know about, or look into, this policy should be used; employees are strongly encouraged not to ignore the concern. This Whistleblowing Policy is primarily for concerns where the interests of others or of the organisation itself are at risk.

2. Aims

2.1 This policy aims to:

- Provide a framework for reporting of concerns in the public interest that may include (but not exclusive):
  - Criminal offences (e.g. fraud or corruption)
  - Health and Safety risks to staff or pupils
  - Sexual harassment
  - Breaches of legal obligations or statutory requirements
  - Financial malpractice or breaches of financial procedures
  - Attempts to cover up wrongdoing
  - Environmental damage
- Encourage individuals who become aware of suspected wrongdoing to report it as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff in the Trust know how to raise concerns about potential wrongdoing in or by the Trust
- Set clear procedures for how the Trust will respond to such concerns
- Let all staff know the protection available to them if they raise a whistleblowing concern,

- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (with the exception of vexatious or malicious claims).
- Comply with the Public Interest Disclosure Act 1998, Equality Act 2010, Academy Trust Handbook and the anticipated standards from the proposed Office of the Whistleblower.

3. Scope

3.1 This policy applies to all employees, agency, contractors, volunteers, Members, Trustees, Governors and other workers who provide services to the Trust. This includes permanent and temporary employees of the Trust and Trust employees seconded to a third party. In addition, it includes self-employed consultants or contractors who provide services on a personal basis and agency workers. The policy also applies to Governors and Trustees involved in the governance of the Trust.

3.2 It is not intended that this policy, be used to raise concerns which fall within the scope of other Trust procedures where more appropriate procedures are available. For example, staff grievances should be raised under the Grievance Policy. Similarly, all our schools have procedures for concerns to be raised regarding the safety of individual children or young people. Complainants should refer to the Safeguarding Policy without delay and speak to the Headteacher or Designated Safeguarding Lead (DSL) if the Headteacher is not available.

3.3 This policy has been written in line with the Academy Trust Handbook as well as the government guidance on whistleblowing, and the Public Interest Disclosure Act 1998. This policy complies with the Trust's funding agreement and articles of association.

4. Safeguards

Harassment or Victimisation

4.1 The Trust recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Trust will not tolerate harassment, victimisation or retaliation and will act to protect those raising a concern in good faith. Anyone raising a genuine concern under this policy, will not suffer any detriment in connection with their employment, even if they were mistaken in their concern and confidentiality will be maintained wherever possible.

4.2 It is possible that a whistleblowing concern is raised during another ongoing process, for example a redundancy process. In such cases, consideration will be given to any possible impact of the whistleblowing concern on that other ongoing process and if any alternative actions need to be taken. Continuation of the ongoing process is a possible outcome following this consideration.

4.3 The Trust recognises that sexual harassment can have serious impacts on individuals and the wider school community. The Trust confirms that reporting sexual harassment qualifies as whistleblowing where the concern is raised in the public interest. Individuals raising such concerns are legally protected from detriment and, if an employee, unfair dismissal as a result of making the disclosure. Concerns may be raised whether the behaviour involves staff, students, contractors, volunteers, visitors or third parties. Staff who report sexual harassment under this policy are entitled to enhanced protection under whistleblowing law (from April 2026). The Trust will ensure that no member of staff is subjected to: -

- Bullying
- Isolation
- Disciplinary action made in bad faith
- Removal of duties
- Unfair dismissal

Any confidentiality clauses within Trust settlement agreements cannot and will not prevent staff from reporting concerns relating to sexual harassment.

Confidentiality

4.3 The Trust will take all reasonable steps to deal with concerns in the strictest confidence and to protect the identity of those raising a concern who do not want their name to be disclosed. However, should a matter progress to a formal process, for example, criminal or legal proceedings, it may be necessary for an individual to be identified. If this is the case, this will be discussed with the individual before any disclosure is made.

Anonymous Allegations

4.4 Individuals are strongly encouraged to put their name to any allegation they make. Concerns expressed anonymously are significantly more problematic for the Trust to investigate and make it more difficult to protect the position of the individual or give them feedback. Concerns raised anonymously are much less powerful and less likely to be effective, but they will be considered at the discretion of the Trust. It is not possible for individuals raising concerns anonymously to receive the protections afforded by this policy and the legislation.

4.5 In exercising discretion on whether to progress an anonymous complaint, the factors considered by the Trust would include:

- the seriousness of the issues raised;
- the credibility and plausibility of the concern; and
- the likelihood of confirming the allegation from attributable sources

Malicious or Vexatious Allegations

4.6 If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the individual reporting the concern. If, however, a

malicious or vexatious allegation is made, disciplinary action may be considered. Such allegations are those which have no substance and may be made with ill intent, to do harm or cause annoyance.

5. How to raise a concern within the Trust

5.1 As a first step, individuals should normally raise any concerns with their line manager or a senior leader. It is hoped that the majority of concerns can be resolved through line management/senior management discussions. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice.

5.2 For those not employed by the Trust, for example, contractors and supply staff, concerns should be initially raised through their contract manager or main contact person within the Trust. Governors and Trustees should raise concerns with the Head of Governance.

5.3 Individuals should consider the examples detailed in paragraph 2.1 when deciding whether their concern is of a whistleblowing nature, and judge whether the incident was illegal, breached statutory or Trust procedures, put people in danger or was an attempt to cover any such activity up. Should anyone believe that their concern meets the criteria for whistleblowing (including sexual harassment) it should be raised with one of the following individuals:

Chief Operating Officer
c/o North Durham Academy
High Street
Stanley
Co. Durham
DH9 0TW
01207 291194

Chief Executive Officer
c/o North Durham Academy
High Street
Stanley
Co. Durham
DH9 0TW
01207 291194

Chair of the Academies Trust Board
c/o North Durham Academy
High Street
Stanley
Co. Durham
DH9 0TW
01207 291194

5.4 Should the subject of the concern relate to those listed above individuals should contact the HR Department for further advice and guidance (hr@ncdat.org.uk).

5.5 Concerns are better raised in writing, providing details regarding the concern being raised. This should include the background and history of the concern, giving names, dates and places where possible, and the reason why the individual is particularly concerned about the situation. If the whistleblower does not feel able to put their concern in writing, they can telephone or meet the appropriate person.

5.6 In all cases, whistleblowers should state if they wish to raise the matter in confidence so the person contacted can make appropriate arrangements. In addition, whilst those raising a concern are not expected to prove the truth of the allegation, they should be prepared to set out sufficient grounds for their concern.

5.7 Individuals are encouraged to raise their concern as early as possible as this will make it easier for the Trust to act. Those wishing to raise a concern are encouraged to take advice from their Trade Union representative at this stage.

6. How the Trust will respond

6.1 The action taken by the Trust will depend on the nature of the concern. The matter will be considered by the Chief Executive Officer, who may decide that it:

- be investigated internally
- be referred to the Police
- be referred to the Local Authority Designated Officer
- be referred for external independent investigators
- be referred to the Internal Auditor to investigate
- be referred to the External Auditor.

6.2 In order to protect individuals and the Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed actions without the need for further investigation.

6.3 Within ten working days of a concern being received, the Trust will write to the whistleblower:

- acknowledging that the concern has been received
- indicating, in overall terms, how it proposes to deal with the matter
- giving, where possible, an estimate of how long it will take to provide a final response
- confirming whether any initial enquiries have been made; and
- confirming whether there is sufficient cause for concern to warrant further investigations, and if not, why not.

6.4 The amount of contact between the person nominated to investigate and consider the issues raised and whistleblower, will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the individual who may be required to attend meetings or be interviewed as part of the investigation.

6.5 When any meeting or interview is arranged, any employee of the Trust will have the right to be accompanied by a Trade Union representative or a workplace colleague not involved in the area to which the concern relates. At this meeting it will be confirmed that the employee is protected from unfair treatment or risk of dismissal as a result of raising a concern.

6.6 The Trust will take steps to support any employee raising a concern and aim to minimise any difficulties which they may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Trust will support them through the process.

6.7 If an investigation is undertaken, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter may be rectified and whether or not a referral is required to an external organisation.

6.8 The Trust accepts that the whistleblower needs to be assured that the matter has been properly addressed and as such, where possible, the Trust will provide information in this regard, including the outcome of the investigation. However, confidential information will not be shared, for example, regarding any disciplinary action taken against an employee.

6.9 The Trust, following the receipt of the investigation report, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

7. Independent Advice

7.1 If an individual is unsure whether their concern may constitute a whistleblowing complaint and whether to use this Policy or for independent advice at any stage, they may contact:

- if applicable, an employee's Trade Union;
- Protect, an independent charity providing free, confidential whistleblowing advice. Further information is available on their website: https://protect-advice.org.uk. They can be contacted on 020 3117 2520 or by completing a webform on their website.

8. How the matter can be taken further

8.1 This policy is intended to provide individuals with an avenue to raise concerns within the Trust and to give them the reassurance they need to raise such matters internally.

If a person is not satisfied that their concerns have been effectively deal with and feel it is right to take the matter outside the Trust, the following are possible contact points:

- the Trust's External Auditor (WBG Ltd) 0141 5667000
- an employee's own Trade Union
- the Advisory, Conciliation and Arbitration Service (Acas)
- Protect (Whistleblowing charity) https://protect-advice.org.uk
- A prescribed person or body. Gov.uk - Prescribed Persons - Bodies
- Durham County Council's Local Authority Designated Officer 0300 0260000
- Commissioners for HM Revenue and Customs (HMRC) 0800 788887 Report tax fraud or avoidance to HMRC - GOV.UK (www.gov.uk)
- Comptroller and Auditor General 02077987999
- Office of Qualifications and Examination Regulation (Ofqual) 0300 3033344 whistleblowing@ofqual.gov.uk
- Secretary of State for Education 0370 000 2288 https://www.gov.uk/contact-dfe
- Health and Safety Executive 0300 003 1647 Whistleblowers - Contact HSE
- Support for Whistleblowing employees Whistleblowing for employees: What is a whistleblower - GOV.UK

8.2 The Trust would rather individuals raise a matter with the appropriate regulator or outside body than not at all. A concern may be raised with any of the above provided that:

a) the disclosure is made in good faith
b) there is a reasonable belief that the information disclosed, and any allegation contained in it, are substantially true
c) the disclosure is not made for the purposes of personal gain. Appropriate independent advice should be sought prior to raising a matter externally (see 7.1 above).

8.3 Individuals choosing to take a matter outside of the Trust need to ensure that they do not disclose confidential or privileged information

9. Monitoring and Review of the Policy

9.1 The Trust's Chief Operating Officer has overall responsibility for the maintenance and operation of the Whistleblowing Policy. The Chief Operating Officer will maintain a corporate register of the number and nature of the concerns raised and the outcomes (but in a form which does not compromise confidentiality where this has been requested) and will report as necessary to the Chief Executive Officer and the Trust, where appropriate.

9.2 The policy will be reviewed on an annual basis to ensure the Policy remains up to date and to ensure it remains effective.