



# WHISTLEBLOWING POLICY

**Updated: September 2019**

**Review Date: September 2020**

**Review led by: L. Doidge**

1. The staff, governors and directors within Matrix Academy Trust seek to run all aspects of Trust business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, governors, directors or the school community at large become aware of activities which give cause for concern, Matrix Academy Trust has established the following Whistleblowing Policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

2. Throughout this policy, the term *whistleblower* denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the *Second Report of the Committee on Standards in Public Life: Local Spending Bodies* published in May 1996.

3. Whistleblowing is about systemic or procedural failures and is not only confined to issues about staff conduct. The term “whistleblowing” is sometimes confused with the need to report safeguarding or professional concerns about another member of staff or adult in the school. Concerns about staff behaviour should always be taken to the Headteacher, Chief Executive (or to the Chair of Directors of the Trust if it is about the Chief Executive). Please refer to the school’s Safeguarding Policy with guidance on reporting a safeguarding concern.

4. Matrix Academy Trust is committed to tackling fraud and other forms of unacceptable conduct and treats these issues seriously. Matrix Academy Trust recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the trust or school environment but also has recourse to an external party outside the management structure of the trust.

5. Matrix Academy Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

6. The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under the Matrix grievance procedures.

7. This procedure does not form part of any employee’s contract of employment and it may be amended at anytime.

## 8. When might the Whistleblowing Policy apply?

8.1 The type of activity or behaviour which Matrix Academy Trust considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of school assets or funds
- decision-making for personal gain
- any criminal activity
- abuse of position
- fraud, deceit or corruption
- serious breaches of school procedures which may advantage a particular party (for example

- tampering with tender documentation, failure to register a personal interest)
- inadequate child welfare
- health and safety breaches
- environmental damage
- failure to disclose wrong-doing
- any other activity which may be illegal, neglectful or improper

## 9. What action should the *whistleblower* take?

9.1 Matrix Academy Trust encourages the *whistleblower* to raise the matter internally in the first instance to allow those staff, governors or directors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

9.2 Matrix Academy Trust has designated a number of individuals to specifically deal with such matters and the *whistleblower* is invited to decide which of those individuals would be the most appropriate person to deal with the matter.

| Position                   | Name                 |
|----------------------------|----------------------|
| Headteacher of your school |                      |
| Chief Executive            | Dame Maureen Brennan |
| Chair of Directors         | Jeremy Bench         |
| Director                   | Stephen Smith        |

Matrix Academy Trust  
Leamore Lane  
Bloxwich  
West Midlands  
WS2 7PS

Phone: 01922 211 264

9.3 The *whistleblower* may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

9.4 Alternatively, if the *whistleblower* considers the matter too serious or sensitive to raise within the internal environment of the trust, the matter should be directed to:

Department for Education  
Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

Phone: 0370 000 2288  
Website : [www.education.gov.uk/help/contactus](http://www.education.gov.uk/help/contactus)

9.5 The DfE has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the *whistleblower*. The DfE will ensure relevant officers are informed as appropriate.

9.6 In addition, information and advice can be obtained from the charity Public Concern at Work. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and

without obligation. Contact details for the charity are as follows:

Public Concern at Work  
CAN Mezzanine  
7 - 14 Great Dover Street  
Phone : 020 7404 6609  
London  
SE1 4YR

Email : [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)  
Website : [www.pcaw.co.uk](http://www.pcaw.co.uk)

Whistleblowing advice line NSPCC  
0800 028 0285  
[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

9.7 The NSPCC can provide assistance for Whistleblowing incidents in relation to (e.g. abuse of trust/position)child welfare only.

## 10. How will the matter be progressed?

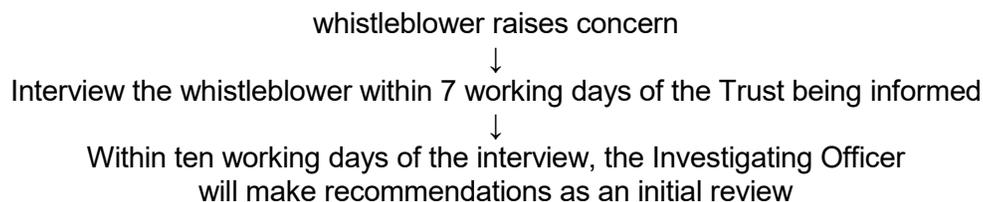
10.1 A independent investigating officer will be assigned. For example, the investigating officer will be appointed from another trust school or similar. The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of staff, the trust's external auditors, legal or personnel advisors, the police, LADO (Local Authority Designated Officer) and the Department for Education.

10.2 Records will be kept of work undertaken and actions taken throughout the investigation. All records taken will be treated confidentially The investigating officer(s), possibly in conjunction with the Board of Directors, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral such as the police.

10.3 The *whistleblower* will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the board of directors.

10.4 If the *whistleblower* is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the investigating officer(s) and the board of directors. After taking this concern up with the investigating officer and the board of directors the *whistleblower is still* concerned they could then take advice from an external agency such as the NSPCC.

### Timeline



↓  
A full conclusion of an investigation will be made within 28 working days  
of the initial interview

↓  
If the whistleblower is dissatisfied with the conduct or resolution of the investigation they should  
raise this with the investigating officer and the board of directors

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If there are still concerns, the whistleblower could take advice from an external agency such as  
the NSPCC

## 11. Respecting confidentiality

11.1 Wherever possible Matrix Academy Trust seeks to respect the confidentiality and anonymity of the *whistleblower* and will as far as possible protect him/her from reprisals. Matrix Academy Trust will not tolerate any attempt to victimise the *whistleblower* or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

## 12. Raising unfounded malicious concerns

12.1 Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances

## 13. Conclusion

13.1 Existing good practice within Matrix Academy Trust in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the trust operates ensure that cases of impropriety, suspected fraud or unacceptable conduct rarely occur. This Whistleblowing Policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the trust. This document is a public commitment that concerns are taken seriously and will be actioned.