ALL SAINTS' TRUST

WHISTLEBLOWING POLICY

Introduction
The All Saints' Trust (AST) is a Catholic Academy Trust within the Diocese of Westminster. The Trust, its Academies Local Governing Boards and staff seek to run all aspects of the Trust's business and activity with full regard for high standards of conduct and integrity. If members of the Trust Board, Local Governing Boards, Academy staff or the school community at large become aware of activities which give cause for concern, The AST has this whistleblowing policy; this 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, under the school's disciplinary procedure.

The Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The AST 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 structure and its school environment but also has recourse to an external party outside the management structure of the Trust.

When might the whistleblowing policy apply?
Individuals are encouraged to come forward in good faith with genuine concerns knowing they will be taken seriously. A whistleblower should ask a few questions before taking action:

- Is it, or do you believe it to be, illegal?
- Is it, or do you believe it to be, against codes of practice issued by the Trust, the Diocese, the DfE, or a professional body?
- Does it contradict what the employee has been taught, or should have been taught?
- Is it about an individual's behaviour or is it about general working practices?
- Has the whistleblower witnessed the incident?

If any individual raises malicious unfounded concerns or attempts 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.

All allegations should be capable of being dealt with through the disciplinary procedure and will be considered appropriately.

Where the alleged activity or behaviour cannot be dealt with under the scope of other procedures then consideration should be given to using this whistleblowing policy e.g.

- conduct which is an offence, a breach of the law or contrary to Church teaching
- manipulation of accounting records and finances
- inappropriate use of Trust or Church assets or funds
- disclosures related to miscarriages of justice
- decision-making for personal gain
- any criminal activity
- damage to the environment of the Trust and its schools
- dangerous practices
- abuse of position
- fraud and deceit or corrupt practices
- serious breaches of Trust procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- sexual or physical abuse of pupils or others
- other unethical conduct.
- Modern slavery 2015: risk of modern slavery or human trafficking

Anonymous allegations will only be considered if the issues raised are:

- Very serious
- The credibility of the allegation is considered to be high
- The likelihood of confirming the allegation is high

Procedure
The AST encourages the whistleblower to raise the matter internally in the first instance with their line manager (or the Headteacher of the school if the line manager is the one under suspicion or with the Chair of Governors of the school if the Headteacher is the one under suspicion). This will allow them to right the wrong and give an explanation for the behaviour or activity. Alternatively, the whistleblower may request a private and confidential meeting in the first instance with the person who is causing concern. He/she may be accompanied by a representative of their choice if they so wish (e.g. Union representative or friend)

All matters will be treated in strict confidence and anonymity will be respected wherever possible. Written, dated and signed supporting evidence and statements should always be taken to any meetings if possible.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to the Company Secretary of the Trust Board, although the Board will need to involve the appropriate governors.
The Trust will ensure relevant officers of the Board or DfE are informed as appropriate and should advise the Local Governing Board of appropriate steps to take.

If the matter relates to the Trust central services rather than an issue at the individual school within the Multi Academy Trust the matter should be directed in the first instance to the Chair of the Trust Board (or the Diocese if the Chair is the one under suspicion) although the Board will need to involve the appropriate Directors.
The Trust will ensure relevant officers of the Diocese or DfE are informed as appropriate and should advise the Trust Board of appropriate steps to take.

How will the matter be progressed?
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 or should 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 the Trust or school staff, the school's external auditors, legal or personnel advisors, the police or the DFE.

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

Depending on the nature of the concern or allegation and whether or not the investigating officer considers there to be a case to answer, the disciplinary procedure may be applied. In such cases any disciplinary action will be considered by the dismissal committee and if appropriate the dismissal appeals committee of the Local Governing Board. Where a case is proven on the balance of probability the matter will be reported to the Local Governing Board, the Trust and where appropriate the DfE.

If the concern relates to the Trust central structure and not within one of the Academy Trusts the Diocese will be asked to undertake the investigation as an independent officer to consider if the Trust has a case to answer. In such cases any disciplinary action will be considered by the dismissal committee and if appropriate the dismissal appeals committee of the Trust. Where a case is proven on the balance of probability the matter will be reported to the Trust Board, the Diocese and where appropriate the DfE.

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 may be raised with the Chair of Governors or, for financial impropriety, the school's Responsible Officer if it relates to an academy within the Trust or to the Chair of the Trust or, for financial impropriety, the Trusts Responsible Officer. If that fails to resolve matters, then the employee should seek the assistance of "Public Concern at Work" on 0207 404 6609. For any concerns taken outside of the Trust this policy will not apply and any employee raising issues on a wider basis, e.g. with the press, without following the procedure in this policy may be liable to disciplinary action.

Respecting confidentiality
Wherever possible the AST seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. The AST will not tolerate any attempt to harass or victimise the whistleblower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Conclusion
Existing good practice within the AST in terms of its systems of internal control, both financial and non-financial, and the external regulatory environment in which the Trust and its school operates, ensure that cases of suspected fraud or impropriety 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 and its schools. This document is a public commitment that concerns are taken seriously and will be actioned. Any actions arising from allegations/investigation must be in accord with the Trust's disciplinary procedure, which should cover all of the potential areas of concern.

At all times the information and advice which can be obtained from the Diocese, the Trust and DfE should be utilised, particularly where dismissal or appeal to the Employment Tribunal is possible.

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