LDST
Liverpool Diocesan Schools Trust

WHISTLEBLOWING POLICY

OUR TRUST'S PRAYER

Heavenly Father

Let peace, friendship and love grow in our schools

Send the Holy Spirit to give:

Excellence to our learning

Love to our actions and

Joy to our worship

Guide us to help others

So that we may all

Learn, Love and Achieve, Together with Jesus.

Amen

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected risk or wrongdoing as per the definition stated within this policy.

1. Our Mission

1.1. To create a Trust in which our schools will thrive under the leadership of Headteachers, supported and challenged by local governing bodies and accountable to the board of trustees.

1.2. We will achieve this by living our values of:

- Collaboration
- Valuing the Local
- Valuing Difference
- Inclusion

1.3. We want to ensure that all our children to flourish and reach their full potential, within the explicit Christian culture of our schools.

2. Introduction

2.1. We are committed to the highest possible standards of honesty and integrity and we expect all staff to reflect these standards, in line with the Trust's Christian values. The Trust recognises that culture of openness and accountability is essential to achieve these standards. There may be, however, times when there is unethical, negligent, or illegal conduct taking place without knowledge of Liverpool Diocesan Schools Trust (LDST).

2.2. This policy provides the basis on which this type of unacceptable conduct can be reported and be addressed.

3. Scope

3.1. 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
- Provide staff with guidance as to how to raise those concerns
- Reassure staff that they should be able to raise genuine concerns in the public interest without fear of victimisation, subsequent discrimination, or disadvantage, even if they turn out to be mistaken.

3.2. This policy takes account of the Government Whistleblowing Guidance for Employers and Code of Practice.

3.3. This policy applies to all individuals working at all levels of the organisation; governors, directors, employees, consultants, contractors, trainees, homeworkers, part-time workers, fixed-term workers, volunteers, casual

workers, agency staff (referred to as "staff member" or "member of staff" in this policy).

3.4. If a member of staff has any genuine concerns related to suspected wrongdoing or danger affecting any of The Trust's activities, (a whistleblowing concern) they should report it under this policy.

4. Definitions

4.1. Whistleblowing legislation is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).

4.2. Whistleblowing is the term used when a staff member passes on information concerning wrongdoing. This can be called "making a disclosure" or "blowing the whistle".

4.3. The reported wrongdoing will typically (although not necessarily) be something that the member of staff has witnessed at work.

4.4. To be covered by the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998), the staff member who makes a disclosure must believe that they are acting in the public interest.

4.5. This policy should not be used for complaints relating to one's own personal circumstances, such as the way a member of staff has been treated at work. In those cases, the LDST Grievance Policy would apply. This can be found on the LDST intranet pages or, as a paper copy, within LDST workplaces.

4.6. The staff member must also reasonably believe that the disclosure shows past, present, or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone's health and safety
- damage to the environment
- covering up wrongdoing in the above categories

4.7. If a staff member is unsure whether something is within scope of this policy, advice should be sought from Human Resources.

5. Raising a Whistleblowing Concern

5.1. Those colleagues who are trade union members may benefit from seeking advice from their trade union before raising a whistleblowing concern.

5.2. In most cases, where a staff member has a concern, it would be appropriate to raise this with their manager. The member of staff may tell them in person or put the matter in writing if they prefer. Where a manager is verbally informed, they will share a written note of the conversation with the staff member. They may be able to agree a way of resolving the staff members concern quickly and effectively.

5.3. The manager may refer the matter to the Headteacher, Chair of Governors or a member of the LDST Executive Team if they consider it appropriate and proportionate.

5.4. However, it is recognised that there may be situations where a member of staff does not feel it is appropriate to approach their direct manager. Examples include but, are not limited to; where the staff member considers the matter to be too serious, or where their line manager has not addressed their concern previously.

5.5. If a situation, in accordance with 5.3, arises then staff should raise their concern with one of the following, contact information for whom can be found in Appendix 1:

- Deputy Headteacher
- Headteacher
- The Chair of Governors
- The Trust Education Officer
- The Trust HR Lead
- The Chief Executive Officer

5.6. A meeting will be arranged with the staff member who has raised a whistleblowing concern as soon as reasonably possibly to discuss their concern(s).

5.7. The member of staff may bring a colleague or union representative to any meeting conducted under this policy. Any companion or representative must respect the confidentiality of the disclosure and any subsequent investigation.

5.8. A written summary of the staff members concern will be made at the meeting and they will be provided with a copy within 5 working days of the meeting. An indication of how it is proposed to deal with the matter will also be provided.

6. Confidentiality

6.1. Staff members will be supported to voice whistleblowing concerns openly under this policy.

6.2. If a member of staff wishes to raise a concern confidentially, The Trust will make every effort to protect the information about their identity. If it is necessary for anyone who is investigating the concern to know the staff member's identity, this will be discussed with them. The member of staff's identity will not be shared with anyone without consent.

6.3. There may be situations where, despite all reasonable efforts, it is not possible to protect the staff member's identity. For example, where the subject of a whistleblowing concern can deduce an identity from who has witnessed/was aware of the reported incident.

6.4. Full investigation may be more difficult or not possible, where further information cannot be obtained. It may also be more difficult to establish whether any allegations are credible and have been made in the public interest. Therefore, members of staff are encouraged not to raise concerns anonymously, wherever possible.

6.5. Anonymous complaints will be investigated as far as reasonably practicable.

6.6. Whistle blowers who are concerned about possible reprisals (be it victimisation, discrimination, or disadvantage) if their identity is revealed should come forward to the Head Teacher, Trust Education Officer or one of the other contact points. Reasonable measures will then be taken to preserve confidentiality.

6.7. If a criminal offence has occurred, The Trust is required to report the matter to the relevant authorities. If such a situation arises, this will be discussed with the member of staff.

6.8. If needed, members of staff can seek advice from Protect who operate a confidential helpline – 020 3117 2520 and contact service, or from their trade union, particularly if external disclosure is being considered.

7. External Disclosures

7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying whistleblowing concerns, within the workplace. In most cases, staff members should not find it necessary to alert anyone externally.

7.2. In some cases, there may be a legal duty for staff members to report concerns to an external body. However, staff are encouraged to report such concerns within the Trust first, wherever possible. A list of prescribed regulators is also available from the governments website by accessing this link.

7.3. The Trust's position is that members of staff should not inform the media of any concerns pertaining to whistleblowing, as this could potentially compromise the confidentiality and wellbeing of those involved.

7.4. Whistleblowing concerns would usually relate to the conduct of LDST staff, but they may sometimes relate to the actions of a third party. Examples include, but are not limited to, a supplier, a service provider, or a contractor.

7.5. Members of staff can raise a concern in the public interest with a third party, where they reasonably believe that it relates mainly to the third party's actions or something that is legally the third party's responsibility. However, staff are encouraged to report such concerns within the Trust first, wherever possible.

8. Investigation and Outcome

8.1. Once a whistleblowing concern has been raised an initial assessment will be undertaken to determine the scope of any investigation.

8.2. The action taken will depend on the nature of the concern. The matters raised may:

- be investigated by the line manager/head teacher/principal or by the manager with whom the employee raised the matter
- be investigated internally by an appropriately skilled and experienced individual, knowledgeable in the area concerned
- be referred to an external, independent investigator

8.3. The staff member who raised the whistleblowing concern will be informed of the outcome of the assessment unless it would be inappropriate to do so.

8.4. Within ten working days of a concern being received (excluding anonymous disclosure), the manager with whom the employee raised the matter will write to the employee:

- acknowledging that the concern has been received
- indicating the next steps of the process
- giving an estimate of how long it will take to provide a final response

8.5. The member of staff may be required to attend additional meetings to provide further information. In some cases, an investigator, or team of investigators may be appointed. Examples of where this may be appropriate include but, are not limited to; where relevant experience of investigations is required, or where specialist knowledge of the subject matter is required.

8.6. The investigator(s) may make recommendations for change to enable the Trust to minimise future risk. Recommendations may also be made for further action in accordance with the LDST Disciplinary Policy.

8.7. the member of staff who has raised the concern will be kept informed of the progress of the investigation and its likely timescale.

8.8. Any information shared with the staff member must be treated as confidential.

8.9. The need for confidentiality may prevent the sharing of specific details regarding the investigation, or any disciplinary action taken as a result.

8.10. If it is concluded that a member of staff has made false allegations, either maliciously or with a view to personal gain, they may be subject to investigation and a disciplinary action in accordance with the LDST Disciplinary Policy. This can be found on the LDST intranet pages or, as a paper copy, within LDST workplaces.

8.11. If the staff member is not happy with the way in which their concern has been handled, they may contact; the Trust Education Officer, The Chief Executive Officer, or the LDST Board of Directors to discuss their concerns.

9. Protection and Support for Staff who raise a Whistleblowing Concern

9.1. LDST recognises and understands that staff members who raise a whistleblowing concern may be worried about possible repercussions. The Trust encourages openness and will support staff who raise genuine concerns in the public interest under this policy, even if they turn out to be mistaken.

9.2. Staff will not suffer any detrimental treatment as a result of raising a concern in the public interest such as dismissal, disciplinary action, threats, or unfavourable treatment from the employer or co-workers.

9.3. If a member of staff feels they have suffered any detrimental treatment as a result of whistleblowing, they should inform their Headteacher or the Trust HR Lead immediately. Staff may also see advice and support from their trade union representative.

9.4. The person making the disclosure and any person potentially implicated by the disclosure has the right to be accompanied and/or represented by their trade union representative or a work colleague at all stages of the procedure.

9.5. If the employee is required to give evidence in disciplinary or criminal proceedings, HR will advise the employee about the procedure.

10. Responsibility for the Success of this Policy

10.1. The LDST Board of Directors has overall responsibility for this policy. Including legally and operationally, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

10.2. Each Headteacher has day to day operational responsibility for this policy within their school, (the Trust Education Officer for Head Office) and must ensure all staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

10.3. Training and advice are available to ensure employees can easily approach a range of people within the organisation with whistleblowing concerns.

11. Monitoring

11.1. To ensure that we are meeting our public sector equality duty the LDST Board of Directors will monitor annually the impact of this policy by reference to the protected characteristics of staff (age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex and sexual orientation). The results will be shared (anonymised where appropriate) with relevant parties.

Appendix 1 – Contacts

Name of School	Insert
Deputy Headteacher	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
Headteacher	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
Chair of Governors	Name: Insert Telephone: Insert E-mail: Insert Address: Insert
HR	Name: Sophie Derbyshire, HR Lead Telephone: 07883391217 E-mail: sophie.derbyshire@ldst.org.uk Address: LDST Hub, 11 Damfield Lane, Maghull. L31 6DB
Trust Director of Education	Name: Sally Aspinwall Telephone: 07834 513941 E-mail: s.aspinwall@ldst.org.uk Address: LDST Hub, 11 Damfield Lane, Maghull. L31 6DB
Director of Finance and Operations	Name: Steve Boothroyd Telephone: 07956 174 344 E-mail: steve.boothroyd@ldst.org.uk Address: LDST Hub, 11 Damfield Lane, Maghull. L31 6DB
Chief Executive Officer	Name: Laurie Kwissa Telephone: 07983 256 757 E-mail: laurie.kwissa@ldst.org.uk Address: LDST Hub, 11 Damfield Lane, Maghull. L31 6DB
Chair of the Board of Directors	Name: Canon Margaret Swinson E-mail: maggie.swinson@ldst.org.uk Address:

	C/O LDST Hub, 11 Damfield Lane, Maghull. L31 6DB
Protect (Independent Whistleblowing Charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/

Review Schedule

Policy Author	THRL
Policy Approver	LDST Board
Current Policy Version	2
Policy Effective From	1st September 2023
Policy Review Date	October 2026

Revision Schedule

Version	**Revisions**	**By whom**
2	Updated according to changes to statutory guidance	THRL