



**Multi Academy Trust**

# ***Whistleblowing Policy***

***Dover Federation for the Arts Multi Academy Trust***

Signed:	
Policy adopted and ratified:	September 2018
Policy review date:	September 2020

## **Introduction**

The staff and Trustees of The Dover Federation for the Arts Multi Academy Trust (DFAMAT) seek to run all aspects of their Federation business and activity with full regard for high standards of conduct and integrity. In the event that members of DFAMAT, staff, parents, Trustees or the DFAMAT community at large become aware of activities which give cause for concern, the DFAMAT has established the following whistle blowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially. This policy is intended to provide a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

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.

The DFAMAT is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The DFAMAT recognised that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within its Colleges/Schools but also has recourse to an external party outside the management structure of the DFAMAT.

The DFAMAT is committed to creating a climate of trust and openness so that a person who has genuine cause or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

Whistle blowing is regulated by the Public Interest Disclosure Act 1998 and the provisions of this policy apply to disclosure of criminal offences, breach of legal obligations, miscarriages of justice, health and safety, damage to the environment and the deliberate concealment of any of these. The “whistle blower” must reasonably believe that the disclosure is in the public interest. Matters of more general grievance will be dealt with under the DFAMAT grievance procedures.

### **When might the Whistle Blowing Policy apply?**

The type of activity or behaviour which the DFAMAT 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
- Abuse of position
- Any criminal activity
- Fraud and deceit
- Serious breaches of procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- Health and Safety and damage to the environment

### **What Action Should the Whistle Blower Take?**

The DFAMAT encourages the *whistleblower* to raise the matter internally in the first instance to allow those College/School staff and Trustees in positions of responsibility and authority to right the wrong and explain the behaviour or activity.

The DFAMAT has designated a number of individuals to specifically deal with matters and the *whistleblower* is invited to decide which of these individuals would be the most appropriate person to deal with the matter.

<u>Name and Position</u>	<u>Contact Details</u>
Senior Executive Leader	Trust Office 01304 200177
Lee Kane, Principal	Astor College 01304 200107
Sue Knight Fotheringham, Principal	White Cliffs Primary College for the Arts 01304 206174
David Meades, Principal	Shatterlocks Infant 01304 204264 and Nursery School & Barton Junior School 01304 201643
Mr B Williams, Chairman of the Board of Trustees	Trust Office 01304 200177

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.

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 Education Funding Agency, EFA, or Department for Education, DfE.

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  
Suite 306  
16 Baldwin Gardens  
London  
EC1N 7RJ

Telephone: 0207 404 6609

### **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 be resolved internally. The initial assessment may identify the need to involve third parties to further information, advice or assistance, for example involvement of other members of College/School staff, legal or personnel advisors, the police, the Department for Education and the EFA.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s) possibly in conjunction with the Board of Trustees, 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.

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 Trustees.

### **Respecting Confidentiality**

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

### **Raising Unfounded Malicious Concerns**

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 form of penalty appropriate to the circumstances.

### **Conclusion**

Existing good practice within the DFAMAT in terms of its internal financial and non-financial systems and the external regulatory environment in which it 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 DFAMAT.

This document is a public commitment that concerns are taken seriously and will be actioned.

Links to other policies:           Charges, Voluntary Contributions and Remissions Policy  
  Data Protection Policy  
  Records Management  
  Grievance and Complaints Policy  
  Safeguarding Policy