



“Embedding Excellence”

Whistleblowing Policy

Cabot Learning Federation

- 1 Wrong doing at work:** This procedure is designed to deal with disclosure of information by an employee which relates to some danger, bribery, corruption, fraud or other unlawful or unethical conduct in the workplace. Employment legislation governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or from being unfairly dismissed as a result. This procedure is available to all employees who discover something they feel that they should pass on in the interests of the public. All types of wrongdoing are included whether they are acts committed by fellow employees, faults in Academy or Federation procedures or oversights which should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started.
- 2 Grievances:** This procedure should not however be used where you have a complaint relating to your personal circumstances in the workplace. The Grievance Procedure contained in the Employment Manual should be used in such cases.
- 3 Detriment:** Provided that this procedure is used correctly and you make the disclosure in good faith you will not suffer any detriment as a result of reporting the wrongdoing. A failure

to follow this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.

- 4 **Trade Union Representation:** You may consult with your Trade Union representative at any stage.

Stage one

- 5 **Procedure:** You should disclose the suspected wrongdoing first to your Head of Department. In the event that your Head of Department is involved in the suspected wrongdoing, you shall be entitled to proceed directly to Stage Two of this procedure.
- 6 **Response:** You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your Head of Department becoming aware of the disclosure.

Stage two

- 7 **Procedure:** If no response is forthcoming after seven days, or if your Head of Department is involved in the suspected wrongdoing, you shall be entitled to notify the Academy Principal / member of the Executive team as appropriate.
- 8 **Response:** You can expect a response detailing any action taken within seven days of the Academy Principal / member of the Executive team becoming aware of the disclosure.

Stage three

- 9 **Procedure:** If no such response is forthcoming you should inform the Chair of Academy Council and Chief Executive Officer.

Stage four

- 10 **Outside body:** If you do not receive a response within seven days you shall be entitled to notify a relevant and appropriate body outside the Federation which may include:
 - 10.1 the Health and Safety Executive (HSE);
 - 10.2 the Environment Agency;
 - 10.3 the Information Commissioner;
 - 10.4 the Department for Education (DfE);
 - 10.5 the Department for Business, Innovation and Skills (BIS);
 - 10.6 the Police;
 - 10.7 the Charity Commission; or
 - 10.8 Ofsted
- 11 **Bypassing the procedure:** in extreme circumstances you will have the right to either enter the Whistleblowing Policy at Stage Three, rather than following each of the stages or raise concerns directly with a relevant and appropriate outside body at Stage Four of the process without having followed any of the previous stages within this policy. Bypassing the procedure in such a manner may be a wholly appropriate course of action; however such an

action could cause damage and reputational damage to the Federation and/or the Academy, as well as potentially constituting a breach of your own duty of confidentiality. Bypassing the procedure and referring directly to an outside body should therefore only be taken where extreme circumstances exist and following careful consideration, it would be advisable to take advice from your Trade Union if you are considering such an action.

- 12 **Extreme circumstances:** The Federation will consider extreme circumstances exist where you have a reasonable belief that your individual Academy or the Federation as a whole will subject you to a detriment as a result for making a protected disclosure under this policy. Examples include:-
- 12.1 A cover-up is being mounted by your individual Academy or the Federation as a whole directly as a result of the protected disclosure you have made or intend to make.
 - 12.2 Due to a previous complaint not having been promptly dealt with by your individual Academy or the Federation as a whole, that the same approach would be applied to a fresh protected disclosure.
 - 12.3 Staff or children in your individual Academy or the Federation as a whole are at immediate risk of danger or abuse.
- 13 Due to the nature of whistleblowing the above list is not exhaustive and it is also recognised that in certain Extreme Circumstances that employees will have an obligation to raise issues simultaneously with the Federation and the Police. In respect of the above Extreme Circumstances, where the reasonable belief exists at individual Academy level, the process would normally be bypassed to Stage Three and where the reasonable belief exists at Federation level it may be appropriate to bypass the process to Stage Four and raise an external concern.
- 14 **Queries:** If you have any queries about this procedure, you should contact the HR Director.