

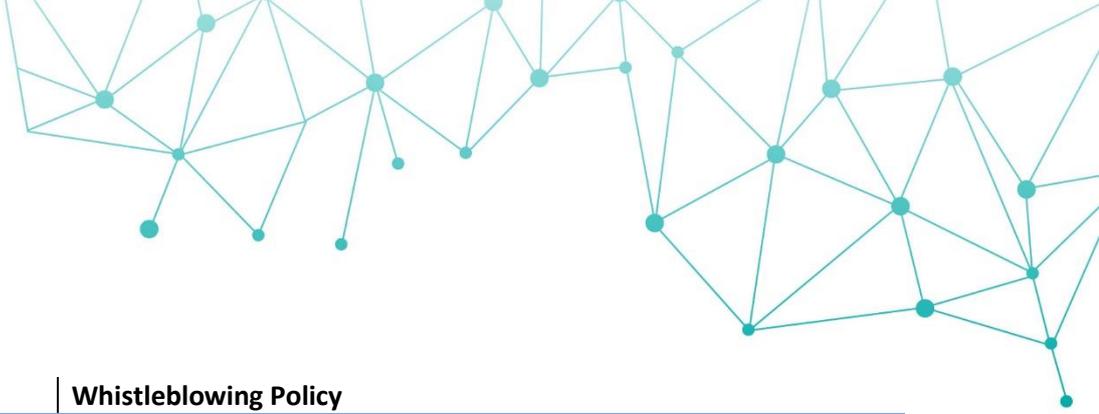


**LANCASTER UNIVERSITY
SCHOOL OF MATHEMATICS**

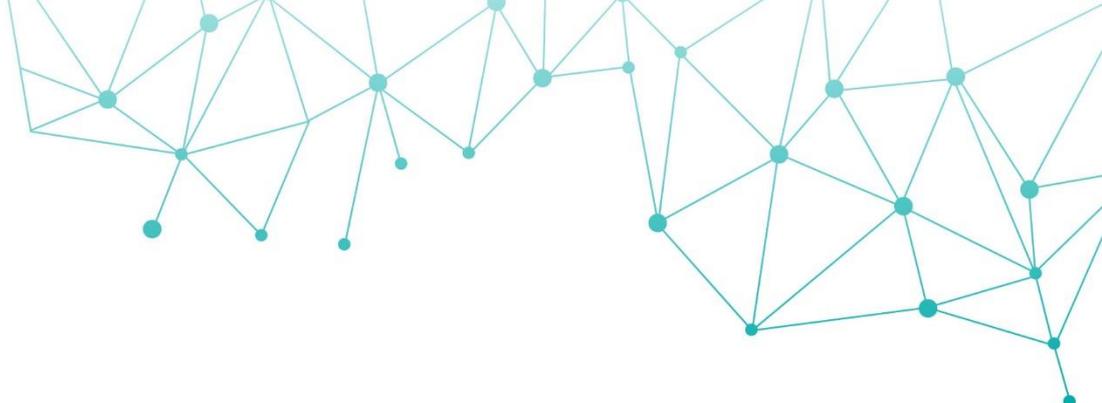
Lancaster University

School of Mathematics

Whistleblowing Policy

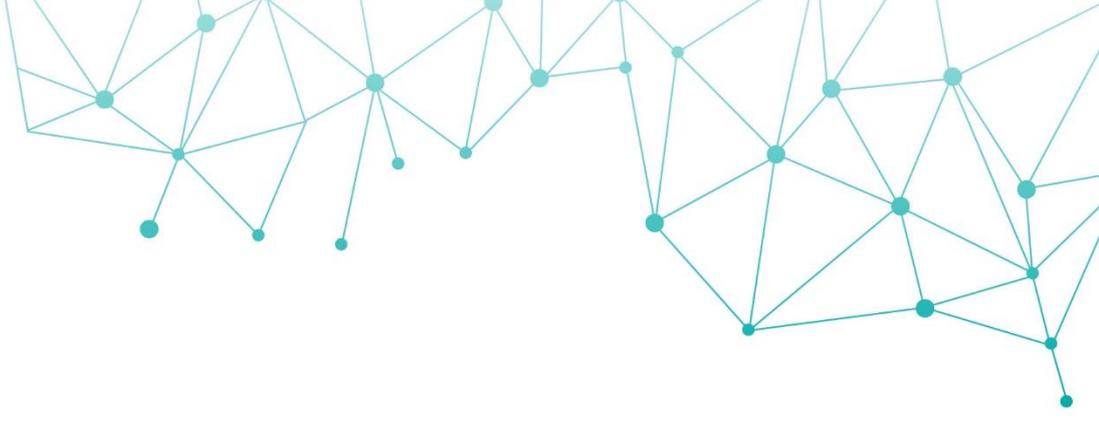


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Contents

1.0. Purpose	2
2.0. Aims and scope of this policy	2
3.0. Safeguards.....	4
3.1. Protection.....	4
3.2. Confidentiality	4
3.3. Untrue Allegations	4
4.0. How to raise a concern	4
5.0. How the school will respond.....	5
6.0. The responsible person.....	6
7.0. Contacts.....	7
8.0. Further information	8
9.0. Review	8



1.0. Purpose

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Staff are often the first to realise that there may be something seriously wrong within the school or the Rigby Education Trust. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues, the school or the Trust.

This policy makes it clear that people can raise concerns without fear of victimisation, subsequent discrimination, or disadvantage.

The Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, it is expected that any suspected wrongdoing will be reported as soon as possible.

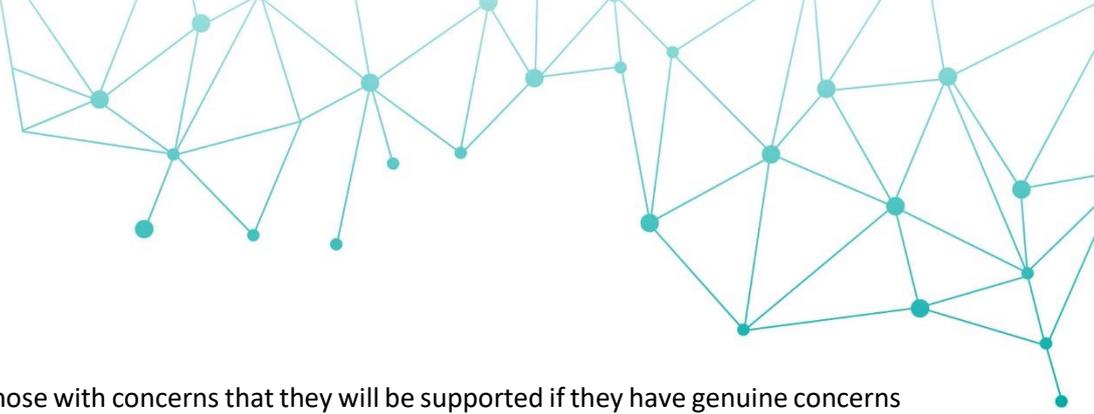
This policy applies to all employees, officers, consultants, contractors, volunteers, governors, casual workers and agency workers. It also covers suppliers and those providing services under a contract with the Trust in their own premises.

This policy does not form part of any employee's contract of employment, and it may be amended at any time following consultation with recognised trade unions.

2.0. Aims and scope of this policy

This policy aims to:

- provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases people should not find it necessary to alert anyone externally. However, the law recognises that in some circumstances it may be appropriate for people to report their concerns to an external body such as a regulator. We strongly encourage anyone with concerns to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.
- encourage people to feel confident in raising serious concerns and to question and act upon concerns about practice.
- ensure that those raising concerns receive a response and, where appropriate, feedback on any action taken

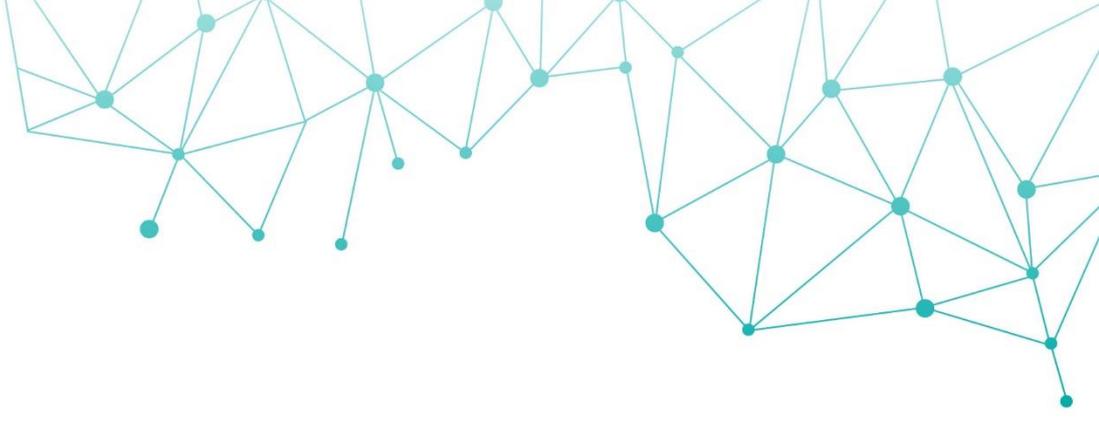
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- reassure those with concerns that they will be supported if they have genuine concerns under this policy, even if they turn out to be mistaken
 - ensure the protections of the Public Interest Disclosure Act are upheld

This policy is not to be used for pursuing individual grievances or private disputes since these are covered by existing procedures/policies. This policy is intended to cover major concerns that fall outside the scope of other procedures. For example:

- conduct which is a criminal offence or breach of law
- disclosures related to miscarriages of justice
- failure to comply with any legal or professional obligation or regulatory requirement, health and safety risks, including risks to the public as well as other members of staff and/or students
- damage to the environment
- the unauthorised use of public funds
- possible fraud and corruption
- abuse of students
- the deliberate covering up of wrongdoing in the above categories, or
- other seriously unethical, unprofessional or unacceptable conduct

Thus, any serious concerns that people have about any aspect of service provision or the conduct of employees or members of the Board of Trustees or others acting on behalf of the Trust can be reported under this policy. This may be about something that:

- makes them feel uncomfortable in terms of known standards, their experience or standards they believe the school or Trust subscribes to
- is against the Trust's documents and policies
- falls below established standard of practice
- amounts to improper conduct



3.0. Safeguards

3.1. Protection

The Trust is committed to good practice and high standards and wants to be supportive to all.

The Trust recognises that the decision to report a concern can be a difficult one to make.

The Trust will not tolerate any detrimental treatment (including informal pressures) towards a 'whistleblower' as a result of them raising a genuine concern. If anyone is involved in any such conduct towards a whistleblower, they may be subject to disciplinary action.

If someone believes that they have suffered any such treatment, they should inform the person dealing with the concern immediately. If the matter is not remedied, the complainant should raise it formally using the Grievance Procedure.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that might already affect the person raising the concern.

3.2. Confidentiality

It is hoped that individuals will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If someone wants to raise a concern confidentially, the Trust will make every effort to keep the identity of the whistleblower secret and only reveal it where necessary to those involved in investigating the concern.

3.3. Untrue Allegations

If someone makes an allegation in good faith, but it is not confirmed by the investigations, no action will be taken against them. If, however, someone makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

4.0. How to raise a concern

As a first step, the individual should normally raise concerns with their immediate line manager or key contact at the school. This depends, however, on the seriousness and sensitivity of the



issues involved and who is suspected of the malpractice. If a line manager is not appropriate for any reason, the person should raise their concerns with any member of school's Senior Leadership Team.

Concerns may be raised verbally or in writing. Individuals who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates)
- the reason why they are particularly concerned about the situation

The earlier that concerns are expressed, the easier it is to take action.

Advice and guidance on how matters of concern may be pursued can be obtained from HR Services.

The individual raising concerns may invite their trade union representative or a colleague to be present during any meetings or interviews in connection with the concerns that have been raised.

5.0. How the school will respond

Where appropriate, the matters raised may:

- be investigated by management
- be referred to the police
- be reported to the Local Authority Designation Officer (Safeguarding)
- be referred to the external auditor
- form the subject of an independent enquiry

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Whilst maintaining the confidentiality of the complainant, the individual complained of must be given details of the allegations so that they can respond, unless this is deemed inappropriate e.g. potential issues of safeguarding, fraud or corruption.



Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken into account before any investigation is conducted.

Within 14 days of a concern being raised, the responsible person will write to the individual who raised the concerns with the following:

- acknowledgment that the concern has been received
- an indication of how the school proposes to deal with the matter
- an estimate of how long it will take to provide a final response
- confirmation of whether any initial enquiries have been made
- information on staff support mechanisms

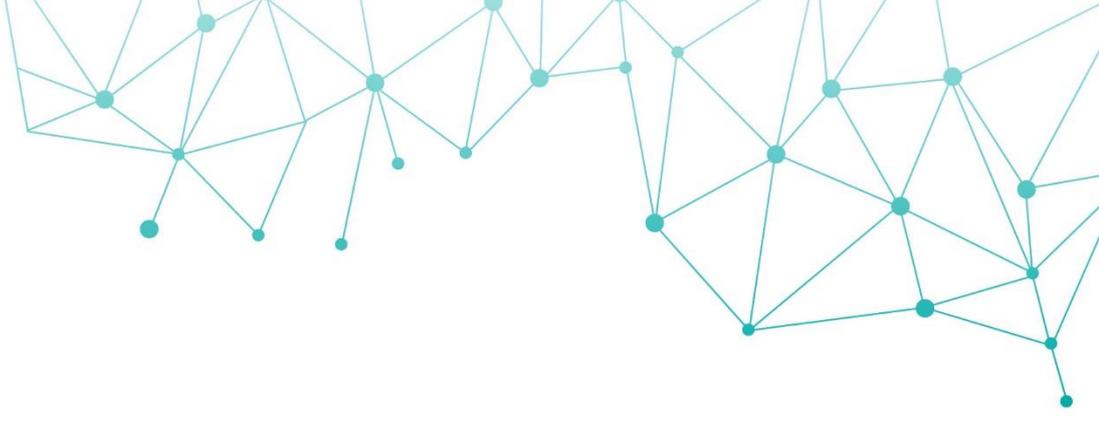
The amount of contact between the staff considering the issues and the individual who raised the concerns will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the school may invite the individual to a meeting to seek further information and/or seek clarification of their concerns.

The school and the Trust will take steps to minimise any difficulties which individuals may experience because of raising a concern. For instance, if they are required to give evidence on behalf of the school or the Trust in criminal or disciplinary proceedings the Trust will arrange for the individuals to receive advice about the procedure.

The Trust accepts that individuals need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the school will inform the individual who raised the concerns of the outcome of any investigation. However, sometimes the need for confidentiality may prevent the Trust giving them specific details of the investigation or any disciplinary action taken as a result. All information about the investigation should be treated as confidential.

6.0. The responsible person

The Executive Principal has overall responsibility for the maintenance and operation of this policy. They will maintain a record of concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Board of Trustees.



7.0. Contacts

This policy is intended to provide an avenue within the school and the Trust to raise concerns. The Trust hopes all persons will be satisfied with any action taken. If they are not, individuals may raise it, in confidence, with the Chair of the Board of Trustees or the Governance Professional.

The following are possible contact points:

- **The Local Authority Designated Officer (Safeguarding)**
Tim Booth
LADO.Admin@lancashire.gov.uk
01772 536 694 or 07826 902522
- **The Trust's External Auditor**
Murray Smith
Darland House
44 Winnington Hill
Northwich
Cheshire, CW8 1AU
Tel: 01606 79411
- **Trade Unions**
- **The Police**
- **The ESFA:**
Education and Skills Funding Agency
Cheylesmore House
Quinton Road
Coventry CV1 2WT
Please see ESFA link below to report a disclosure in the public interest (including whistleblowing):
https://form.education.gov.uk/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-f9f4f5a1-936f-448b-bbeb-9dcdd595f468/AF-Stage-8aa41278-3cdd-45a3-ad87-80cbffb8b992/definition.json&redirectlink=%2Fen&cancelRedirectLink=%2Fen&consentMessage=yes
Please see link below for further guidance on what the ESFA can and cannot investigate:
<https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>

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- **The Department for Business, Energy & Industrial Strategy** (see link for list of prescribed persons) <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

8.0. Further information

Further information is available from:

- The charity Public Concern at Work at <https://protect-advice.org.uk/>

9.0. Review

This policy shall be reviewed regularly. The review process will involve the recognised trade union representatives. Full records should be kept, and sufficient detail disclosed during the review process (excluding names and/or other identifying features).