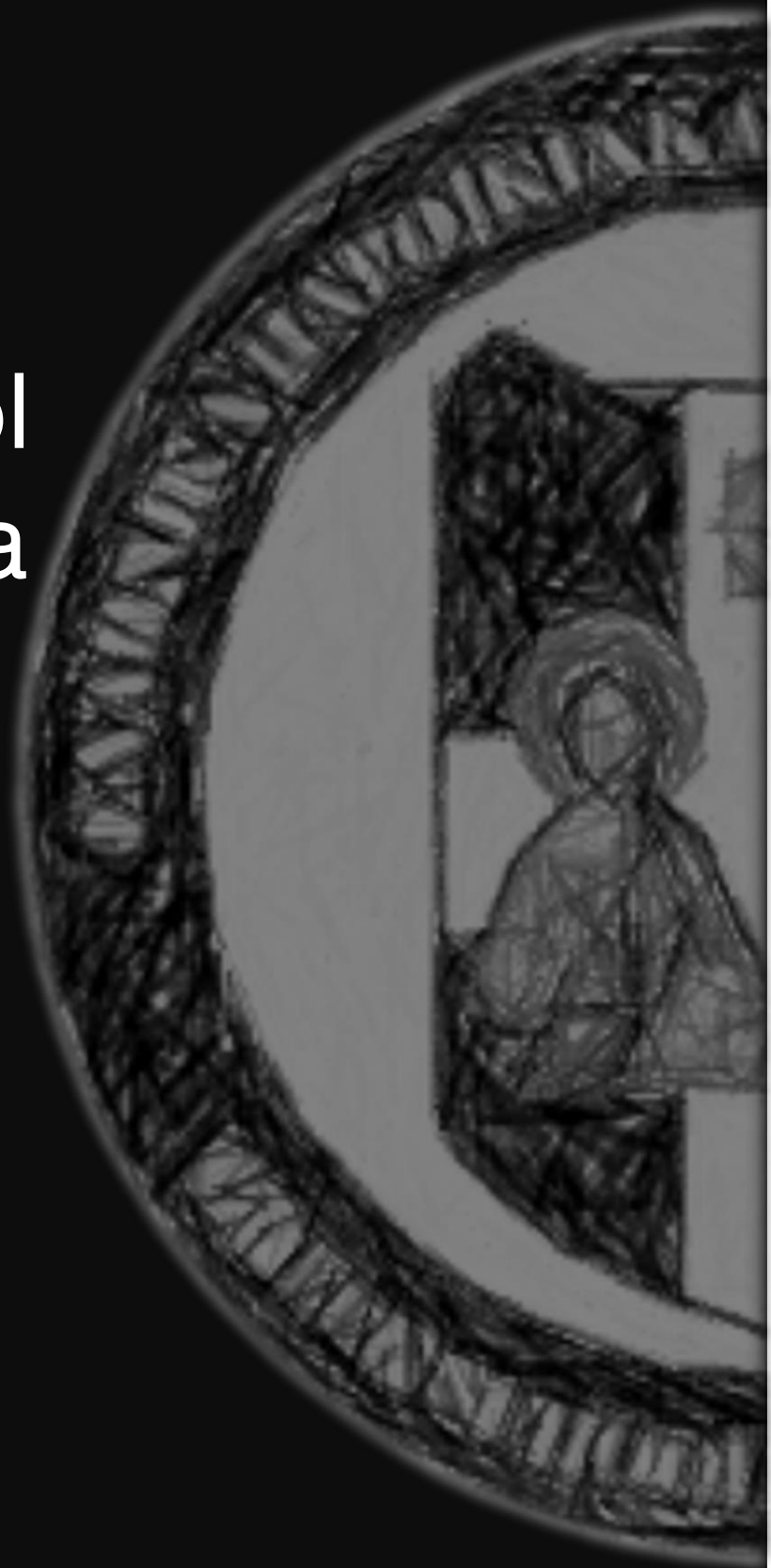


Greek School
of Ayia Triada
Birmingham

Wistleblowing



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1. Introduction

The purpose of this Policy is to foster a culture within the Trust that encourages school staff and other stakeholders to voice any serious concerns they may have, while providing them with assurance that they can do so safely and without fear of reprisal.

It is imperative that any instances of fraud, misconduct, or wrongdoing are promptly reported and appropriately addressed. The School Management Board (MB) actively encourages all individuals to raise concerns they may have regarding the conduct of others or the governance of the Trust.

The School MB is dedicated to upholding the principles of honesty and integrity. A culture of transparency and accountability is essential for ensuring that these values are upheld consistently throughout the organization.

This policy applies to all individuals associated with the Trust, including employees, workers, agency staff, contractors, service providers, volunteers, directors, and any other officers.

It is important to note that this policy does not constitute part of any employee's contract of employment and may be subject to amendment at any time.

2. Aim

If you have concerns regarding how you've been treated, we advise raising them in accordance with our grievance policies.

It's important to note that the whistleblowing policy does not supersede any existing policies or procedures. Should any misconduct be uncovered during an investigation conducted under this policy, the Trust's disciplinary policy will be implemented accordingly.

We strongly encourage individuals to report any concerns they may have, regardless of whether they fall under this policy or any other.

3. What is whistleblowing?

Whistleblowing entails the reporting of information pertaining to actual or suspected wrongdoing, termed a "qualifying disclosure."

A qualifying disclosure is one made in the public interest by a worker who reasonably believes that:

- A criminal offence
- A miscarriage of justice

- An act posing risks to health and safety
- An act causing harm to the environment
- A breach of any other legal obligation
- Concealment of any of the above

The protections provided by this policy do not require whistleblowers to furnish proof of such wrongdoing; rather, they must possess a reasonable belief in its occurrence.

Potential whistleblowers should have reasonable grounds for believing the accuracy of the information they disclose. If a disclosure fails to demonstrate the occurrence or likelihood of one of the six categories of wrongdoing, it cannot qualify as a qualifying disclosure under whistleblowing legislation.

Potential whistleblowers are encouraged to seek support from a senior manager, HR within the Trust, or their trade union representative if they are unsure whether to make a disclosure or require assistance in doing so, regardless of its qualifying status.

4. Protections for whistle-blowers

This policy has been written to take account of the Public Interest Disclosure Act 1998 and other relevant legislations, which protects workers making disclosures.

A whistle-blower who makes a qualifying disclosure has the right not to be dismissed, subjected to any other detrimental detriment, or victimised, because they have made a disclosure.

Victimisation of a whistle-blower for raising a qualifying disclosure will be a disciplinary offence. The Trust will not dismiss anyone on the basis that they have made an appropriate lawful disclosure in accordance with the law and this policy.

Whistle-blowers may seek support and advice from organisations such as the whistle blowing charity Protect (<https://protect-advice.org.uk> / 020 3117 2520) or ACAS (www.acas.org.uk).

5. Obligations for the whistle-blower

Instructing someone to conceal wrongdoing constitutes a disciplinary offense. Even if instructed by someone in authority, a whistleblower should not agree to remain silent about any concerns raised or pursued.

Whistleblowing to an external agency without first following the internal procedure outlined below may be deemed a violation of the Trust's Code of Conduct.

Whistleblowing to the media under any circumstances is inappropriate and may be grounds for gross misconduct.

Making a false allegation maliciously is considered a disciplinary offense.

6. Confidentiality

GSAT promotes a culture of open communication and encourages individuals to express their concerns freely. If anyone prefers to raise concerns confidentially, the Trust is committed to safeguarding their anonymity to the fullest extent possible.

Before disclosing a whistleblower's identity to any party, including an investigator, GSAT will engage in consultation with the individual.

While anonymous disclosures are not actively encouraged by GSAT due to potential challenges in establishing the credibility of an allegation and conducting thorough investigations, such concerns will still be treated seriously and investigated to the best of the Trust's ability under this policy.

7. The GSAT's commitment

All matters brought forth under this policy and procedure will be subject to a comprehensive, expedient, and confidential investigation.

While the School strives to provide the employee with updates on the investigation's progress and anticipated timelines, confidentiality obligations may sometimes limit the disclosure of complete information regarding the investigation and subsequent disciplinary actions.

8. Whistleblowing procedure

8.1. Stage 1 – Disclosure

The whistle-blower should initially raise their concern to their line manager. They may do this orally or in writing.

If the concern relates to the line manager or any person to whom they report (other than the Headteacher) the whistle-blower should raise the issue with the Headteacher.

If the concern relates to the Headteacher, the whistle-blower should raise this with the Director or employee named at the end of this policy.

If the concern is about the Chair of Governors, any individual governor or the whole local governing body should be addressed should be addressed to Mr Gaspare Nicolini, Chair of Directors, via the trust office at r.faulkner@stfrancistrust.net. Please mark them as Private and Confidential.

If the concern is about the Chief Executive Officer (CEO) or a Director of the Trust, should be addressed to Mr Gaspare Nicolini, Chair of Directors, via the trust office at r.faulkner@stfrancistrust.net. Please mark them as Private and Confidential.

8.2. Stage 2 – Investigation

The Trust will arrange an investigation into the concerns raised. This will take place as soon as is reasonably practicable.

The investigation may involve the whistle-blower and other individuals involved meeting with the investigator and giving a written statement.

At any investigatory meetings the whistle-blower is entitled to be accompanied by a recognised trade union representative or a work colleague.

8.3. Step 3 – Report to Directors

The investigator will report to the board of directors before any further action is taken. The board will decide on potential outcomes including, but not limited to:

- invoking the Trust's disciplinary process, or other relevant policy
- referral to the police, government department or regulatory agency
- no further action

On conclusion of any investigation, the whistle-blower will, as far as is practicable and where it is reasonable to do so, be told the outcome of the investigation and what the Trust has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

8.4. Step 4 – Escalation.

If, on conclusion of stages 1, 2 and 3 the whistle-blower reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made.

These include:

- the Financial Conduct Authority (formerly the Financial Services Authority)
- the Health and Safety Executive
- the Environment Agency
- Her Majesty's Chief Inspector of Children's services and skills
- the Secretary of State for Education
- the Office of Qualifications and Examinations Regulator.

A full list can be obtained from the charity, Protect or the BEIS (Department for Business, Energy and Industrial Strategy) website. Alternatively, an employee may contact their professional association or trade union representative for guidance.

9. Data Protection

When an individual makes a disclosure, the Trust will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

10. Contacts

The trust's appointed director for this purpose is: **Gaspare Nicolini, Chair**,
Chair@stfrancistrust.net

The trust's appointed member of staff for this purpose is: **Andrew Celano, CE O** ,
CEO@stfrancistrust.net

Or the independent whistleblowing charity **Protect**: Helpline [020 3117 2520](tel:02031172520)

E-mail: whistle@protect-advice.org.uk

A. Version Control

Version Name	Date	Reason for Update
Draft CCTV (1 st version)	01/05/2016	Not in place, we needed to create
Final Doc of First Version	01/07/2017	Drafted and approved
Reviewed	01/09/2018	Reviewed and approved by MB no changes
Reviewed	01/09/2019	Reviewed and approved by MB no changes
Reviewed	01/09/2020	Reviewed and approved by MB no changes
Reviewed	01/09/2021	Reviewed and approved by MB no changes
Reviewed	20/09/2022	Reviewed and approved by MB no changes
Updated	01-04-2024	No changes