2026

Graveney Trust

Whistleblowing Policy

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Agreed by: Trust Board of Directors

Next review date: Autumn 2027

To be read in conjunction with the Trust's Code of Conduct and Sexual Harassment Policy

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WHISTLEBLOWING POLICY

Introduction

The Board of Directors has introduced this Code of Practice to establish sound procedures for referral and investigation of any internal reports of malpractice. Such reports can concern fraud or potential fraud, but can also cover a range of other things. The reporting arrangements for such matters has become known collectively as "whistleblowing", and attention has been focused, nationally, on more formalised procedures

Underpinning the introduction of a formal policy and associated procedures is the view that to disclose genuine malpractice internally is the right course of action. These policies and procedures can also help protect children and vulnerable adults to whom the Board of Directors owes a duty of care.

1. Preamble

1.1 Staff may well be the first to realise that there could be something seriously wrong within the school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 The Board of Directors of the Graveney Trust (the Trust) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we encourage employees with serious concerns about any aspect of the school's work (e.g. abuse or neglect of a child) to come forward and voice those concerns using this procedure. It is recognised that certain cases will have to proceed on a confidential basis. This document makes it clear that staff can do so without fear of reprisals. Indeed, the Whistleblowing Policy and Procedure are intended to encourage and enable staff to raise serious concerns within the school rather than overlooking a problem or blowing the whistle outside. This last point is very important. It is dealt with fully in sections 5 and 7 below.

1.3 These procedures are in addition to the other statutory reporting procedures and existing procedures for dealing with complaints.

1.4 This policy is based heavily on the Wandsworth Council model which has been consulted on with the professional association and trade union representatives of teaching and support staff and has their support.

2. Aims and Scope of this Policy

2.1 This policy aims to:

- Provide avenues for you to raise serious concerns about any aspect of the Trust's work and receive feedback on any action taken;
- Allow you to take the matter further if you are dissatisfied with the response from the Trust; and;

- Reassure you that you will be protected from possible reprisals or victimisation for reasonable whistleblowing in good faith.

2.2 There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This whistleblowing policy is not intended to cover concerns that can be progressed under existing Human Resources procedures, e.g. complaints, allegations agasint staff, child protection, racial or sexual harassment.

A serious concern may be about something that you sincerely believe in good faith:

- Is unlawful; or
- Is against the policies of the school; or
- Falls below established standards or practice; or
- Amounts to improper conduct; or
- Is a health and safety risk to the public as well as other employees; or
- Involves damage to the environment; or
- Involves the unauthorised use of public funds; or
- Involves possible fraud and corruption; or
- Involves sexual or physical abuse of clients.

3. Fraud

3.1 At this point, special mention should be made of fraud, corruption and financial irregularity.

3.2 Fraud within the public sector costs the taxpayer hundreds of millions of pounds each year and, in general, detected cases of fraud and corruption are on the increase.

3.3 All public sector organisations are likely to be affected in some way by fraudulent or corrupt activity.

3.4 The Metropolitan Police report that they cannot prosecute over half of fraud and corruption cases because of inappropriate action taken before the case is referred to them. Consequently the action that you take, if/when you first suspect fraudulent activity, may be crucial.

3.5 Because of the importance of this matter some of the following paragraphs concerned with whistleblowing give particular guidance on what you should and should not do if you suspect a fraud in the school.

4. Safeguards

4.1 Harassment or Victimisation.

The Trust is committed to good practice and high standards and wants to be supportive of employees. The Trust recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the potential malpractice. The Trust will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith. This principle is described further in the Trust's Preventing Sexual Harassment in the Work Place Policy.

4.2 Should you be the subject of disciplinary, redundancy or other procedures at the point you decide to report an incident or colleague under this procedure, those procedures will continue alongside your whistleblowing complaint

4.3 Confidentiality
The Trust will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

4.4 Anonymous Allegations
This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful and are often difficult to investigate fully, but they will be looked into as far as is possible. Follow-up action will in such cases be at the discretion of the Trust.

4.5 In exercising the discretion, the factors to be taken into account would include:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

4.6 Untrue Allegations
If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. However, when it appears that there are clear grounds for suggesting that you may have acted frivolously, maliciously or vexatiously, the Trust will undertake a disciplinary investigation. Dependent on the outcome, disciplinary action may then follow.

5. How to raise a concern

5.1 If you suspect fraud, corruption or financial irregularity, you should always inform the Chief Executive or Company Secretary directly. No–one elseneeds to be contacted as the Chief Executive or Company Secretary will be responsible for progressing matters following notification, including liaising with such other officers as may be necessary.

5.2 For any other types of concern you should normally, as a first step, raise them with your immediate manager or their superior or your Principal/Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe the senior management is involved, you should approach the Chair of Governors or alternatively, the Chair of the Trust Board or Company Secretary.

5.3 Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet a senior member of staff you feel comfortable talking to.

5.4 The earlier you express the concern, the easier it is to take action.

5.5 Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

5.6 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5.7 You may invite your trade union or professional association to assist you to raise a matter and may wish to seek their advice prior to initiating this procedure.

6. How the Trust will respond

6.1 The Trust will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

6.2 The action taken by the Trust will depend on the nature of the concern. The matters raised may:

- Be investigated internally
- Be referred to the Police
- Be referred to the external Auditor
- Form the subject of an independent inquiry

6.3 In order to protect individuals and the Governing Bodies of the schools concerned, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Trust will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

6.4 Some concerns may be resolved by agreed action without the need for investigation.

6.5 Within ten working days of a concern being received, the Trust will write to you:

- Acknowledging that the concern has been received;
- Indicating how it proposes to deal with the matter;
- Giving an estimate of how long it will take to provide a final response;
- Telling you whether any initial enquiries have been made; and
- Telling you whether further investigations will take place, and if not, why not.

6.6 The amount of contact between the officer considering the issue and you, will depend on the nature of the matter raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

6.7 When any meeting is arranged off site if you so wish, you have the right, if you so wish, to be accompanied by a union or professional association representative or a friend who is not involved in the area of work to which the concern relates.

6.8 The Trust and school governing bodies will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Trust will advise you about the procedure.

6.9 The Trust accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal and other confidentiality constraints, you will receive information about the outcome of any investigation.

7. How the matter can be taken further, if necessary

7.1 This policy is intended to provide you with a clear route to raise concerns within the Trust and for the concerns to be dealt with and settled appropriately. However, if you feel that this has not happened, and if you feel it is right to take the matter outside the Trust, please contact either:-

- The National Audit Office at www.nao.org.uk, or
- Wandsworth Council (Director of Children's Services), or
- The Police (where your concern relates to a criminal matter).

7.2 Please use only these routes to raise a concern externally. Complaints made to other bodies, individuals or the media may actually hamper a speedy, full and professional investigation of the concern that you have expressed.

7.3 Information which is provided to you on a confidential basis must be treated as such and this may only be overridden where there is a clear public interest in disclosing it and you act in good faith and reasonably. You would need to ensure that you could justify your disclosure because it would be a serious betrayal of trust to use confidential information for any personal advantage, or for malicious or other improper reasons.

8. Record Keeping

8.1 The Company Secretary has overall responsibility for the maintenance and operation of this policy. A confidential record of concerns raised and the outcomes (so as not to endanger your confidentiality) will be retained in the Company Secretary's office and will report as necessary to the Trust Board.

9. Checklist of Do's and Don'ts

9.1 Lastly, some of the key points from this procedure are summarised below in the form of Do's and Don'ts:-

DO

a) Make an immediate note of your concerns
Note all relevant details such as what was said in telephone or other conversations, the date, time and the names of any parties involved.

b) Convey your suspicions to someone with the appropriate authority and experience.
- To the Chief Executive or Company Secretary for suspected fraud, or corruption or financial irregularity.
- Usually, to your immediate manager or their supervisor for other matters (but see paragraph 5.2 above for more details).

c) Deal with the matter promptly, if you feel your concerns are warranted. In a case of suspected fraud, it is important to remember that any delay may cause the Trust to suffer further financial loss.

DON'T

a) Do nothing

b) Be afraid of raising your concerns. You will not suffer any recrimination from the Trust or from the school governing body as a result of raising in good faith a serious concern. The Trust will treat any matter you raise sensitively and confidentially.

c) Approach or accuse any individuals directly.

d) Try to investigate the matter yourself.
There are special rules surrounding the gathering of evidence for use in disciplinary or court proceedings. Any attempt to gather evidence or other information by someone who is unfamiliar with these rules may destroy the case.

e) Convey your suspicions to anyone except those with the proper authority and as set out in this policy and procedure.

10. Advice and Guidance

10.1 Further advice and guidance on how a matter may be pursued under this policy can be obtained from the Chief Executive or Company Secretary.

Personnel as of June 2024

Chairman of the Board of Directors	Mr Ian Parkes
Chief Executive of the Trust	Graham Stapleton
Company Secretary	Cynthia Rickman
Chair of Governors Graveney	Mr Ian Parkes
Chair of Governors Tooting Primary	Mr David Chambers
Chair of Governors Franciscan Primary	Mrs Kathy MacLean
Director of Childrens' Services	Mr Ian Dodds