



## Whistleblowing Policy (23 – 24)

(Version 2 : Rev 26 Jun 23)

<b>Adopted by The Hawkmoor Learning Trust</b>	Signature	
	Print Name	
	Date	
	On behalf of the Hawkmoor Learning Trust	

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**Definitions:**

- Qualifying Disclosure** To be a Qualifying Disclosure.  
 A member of THLT Community must make a disclosure of information.  
 The information must relate to one of the six types of “relevant failure”.  
 The member of THLT Community must have a reasonable belief that disclosure is in the public interest.
- Relevant Failure.** In making a qualifying disclosure, the worker must have a reasonable belief that one or more of the six specified types of relevant failure has taken place, is taking place or is likely to take place, (section 43B(1) Employment Rights Act 1996 (ERA)). The six categories are:  
     Criminal offences.  
     Reach of any legal obligation.  
     Miscarriages of justice.  
     Danger to the health and safety of any individual.  
     Damage to the environment.  
     The deliberate concealing of information about any of the above.
- Senior Manager** A Senior Manager is the CEO / Head / Head of School or Trust Finance Director (FD)
- The Trust** The Trust is The Hawksmoor Learning Trust (THLT)
- THLT Community** THLT community (The **Community**) is a Member of the Trust, Trustee, Governor, member of staff, pupil, a parent / carer or a contractor temporarily working on site or visiting THLT.
- Whistle-blower.** A whistle-blower is a person who raises a genuine concern relating to the matters below.
- Whistleblowing.** Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.
- Working day** a day that is not a Saturday or Sunday, Christmas Day, Good Friday or any day that is a bank holiday under the Banking and Financial Dealings Act 1971 in the part of the UK where the company is registered.

**Introduction**

1. This policy applies to any member of THLT community.
2. If any member of THLT Community has any genuine concerns related to suspected wrongdoing or danger affecting any THLT activities (a whistleblowing concern) it should be reported under this policy.
3. The Hawksmoor Learning Trust (THLT) is relentlessly driven by the pursuit of excellence and high expectations of learning, behaviour and respect for every member of our community.

4. The right to be safe, free from bullying, harassment, prejudice or harm is a non- negotiable for any member of the THLT Community (adults and children alike); everyone should feel able to share their concerns with confidence knowing they will be protected and supported.

### Core Values

5. THLT believes that every member of the Community, has the right to be safe and a culture of vigilance and confidence to share genuine concerns without worry of retribution, victimization or harassment must be in place across all areas of the Community.
6. If anyone is concerned about the safety or behaviour of another member of the Community, there is a duty of care to report this and therefore all members of Community must know with whom to share their concerns with.
7. Every member of Community needs to feel they will be listened to, respected and their concerns responded to in a fair, consistent, confidential and appropriate manner in line with policies, procedures, legislation and best practice: A culture and full awareness and understanding of 'it can happen here'.
8. Examples of unacceptable activities may include (This list is indicative not exhaustive):
  - 8.1. criminal activity,
  - 8.2. miscarriages of justice,
  - 8.3. activities that may cause danger to H & S, including risks to the public as well as employees,
  - 8.4. damage to the environment,
  - 8.5. failure to comply with any legal or professional obligation or regulatory requirements,
  - 8.6. bribery'
  - 8.7. financial fraud or mismanagement,
  - 8.8. wilful negligence or negligence by incompetence or omission,
  - 8.9. breach of THLT internal policies and procedures,
  - 8.10. conduct that is an offence or breach of law or conduct likely to cause reputational damage,
  - 8.11. unauthorised disclosure of confidential information,
  - 8.12. public examination fraud,
  - 8.13. unethical conduct, including coercion,
  - 8.14. sexual, physical and / or emotional abuse,
  - 8.15. behaviour deemed inappropriate towards children
  - 8.16. any compromise of General Data Protection Regulations (GDPR) / related extant regulations and
  - 8.17. the deliberate concealment of any of the above matters.

## Aims

9. This policy seeks to provide a process that gives anyone with a concern about THLT the confidence to;
  - 9.1. raise a concern and
  - 9.2. bring that concern to our attention.
10. This policy aims to:
  - 10.1. Encourage and enable any person to;
    - 10.1.a. feel confident in raising serious concerns,
    - 10.1.b. question and act upon concerns,
    - 10.1.c. provide avenues for any person to raise concerns and
    - 10.1.d. receive feedback on any action taken,
  - 10.2. ensure everyone making a referral receives an appropriate response to their concerns,
  - 10.3. describe how to take the matter further if dissatisfied with the THLT / School response,
  - 10.4. reassure anyone making a referral that they will be protected from reprisals or victimisation.
11. Anyone with concerns that any person may be being mistreated / abused can discuss these concerns in confidence with those listed in the appropriate sections below.
12. **Other Complaints.**
  - 12.1. This policy should not be used for complaints about personal circumstances eg such as the way they have has been treated at work. In these cases, an employee should use the Trust / School Grievance Procedure or other policies if more appropriate.
  - 12.2. If the matter relates to salary, the salary review procedures documented in the Trust / School Pay Policy.
13. Any disclosure of information that, in the reasonable belief of a member of Community, is made in the public interest, shall be deemed a Qualifying Disclosure.
14. In accordance with the Public Interest Disclosure Act 1998, THLT protects any employees who make genuine disclosures in 'the public interest' from detriment and / or dismissal.

## Scope of the Policy

15. THLT actively encourages any member of Community with serious concerns about any aspect of the THLT's work, staff or conduct to come forward and voice those concerns.
16. THLT operates within legal requirements and regulations and expects its employees to co-operate in this manner by adhering to all laws, regulations, policies and procedures; any employee becoming aware of inappropriate conduct is obliged to report this activity; there is no ambiguity.
17. **The Freedom of Information (FOIA) 2000.** It is recognised that certain cases will have to proceed on a confidential basis but in accordance with the FOIA, this policy seeks to provide a transparent method for dealing with concerns.

## 18. The Public Interest Disclosures Act (PIDA) 1998.

- 18.1. Whistle-blowers can have confidence through this policy that they have the fullest protections afforded by the PIDA.
- 18.2. The PIDA gives legal protection to employees, trainees, agency staff and contractors against being dismissed or penalised by employers as a result of publicly disclosing certain serious concerns if they are disclosed under procedures identified in the Act.
- 18.3. The Act applies to people at work raising reasonably held, and genuine concerns, in good faith about crime;
- 18.3.a. civil offences;
    - 18.3.a.i negligence,
    - 18.3.a.ii breach of contract and
    - 18.3.a.iii breach of administrative law,
  - 18.3.b. miscarriage of justice,
  - 18.3.c. danger to health and safety or the environment and
  - 18.3.d. the cover up of any of these.
- 18.4. The PIDA;
- 18.4.a. Applies whether or not the information is confidential and
  - 18.4.b. extends to malpractice occurring overseas.
- 18.5. Every member of the THLT community has a responsibility to protect the THLT's interests through the proper adherence to this policy.
- 18.6. This policy is designed to enable everyone in THLT Community to raise concerns or disclose information at a higher level than that which the individual believes shows malpractice.
- 18.7. A disclosure in good faith will be protected if an individual has a reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur.
- 18.8. Disclosures will also be protected if made externally, eg to prescribed regulators such as the Charity Commission, HSE or Inland Revenue, if they comply with the provisions of the Act.
- 18.9. Under the Act, employees of a charity may make a disclosure to the Charity Commission where the matter relates to the proper administration of the charity and of funds given or held for charitable purposes and they have reasonable grounds for concern.
- 18.10. Allegations of child abuse against teachers and other staff and volunteers are dealt with in accordance with Keeping Children Safe in Education (2021) statutory guidance for schools and colleges.

### Raising Concerns

19. THLT actively encourages anyone with concerns to share them.

20. THLT will;
  - 20.1. listen carefully to the concern and
  - 20.2. respond in a sensitive and appropriate way depending upon the nature of the concern.
21. Anyone concerned about any issue of malpractice, including radicalisation or extremism, should raise it with their Line Manager or Head / Head of School without delay.
22. Should an individual be;
  - 22.1. unhappy with the response or feel unable to share it with their line manager or Head / Head of School, they should bring their concerns to the attention of the Chair of the Local Academy Board (LAB).
  - 22.2. concerned or feel unable to approach anyone stated above, they should contact the Executive Principal / CEO.
23. A Member of the Trust should report any concerns to The Chair of the Trust.
24. Any concerns relating to the Executive Principal / CEO or THLT should be raised with the Chair of Trust.
25. If the concern involves the Chair of the Trust, it should be raised with the Vice-Chair who will determine if the concern;
  - 25.1. can be dealt with internally or
  - 25.2. should referred to
    - 25.2.a. Public Concern at Work (PCAW) or
    - 25.2.b. an alternative appropriate external source.

#### **Parental Concerns**

26. If parents have concerns, they should, in the first instance, be raised with the class teacher.
27. If the parental concern is about the class teacher, this should be raised with the key stage leader.

#### **Referral Procedures**

28. Relevant contact information and details about the procedures for raising concerns are outlined in Annex A.
29. Procedures for support and confidentiality are detailed in Annex B.

#### **Anonymous Sharing of Concerns**

30. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the THLT / schools.
31. Factors considered when deciding if further action is required will include the:
  - 31.1. Seriousness of the issue.
  - 31.2. Credibility of the concern.
  - 31.3. Likelihood of being able to obtain the necessary information.

### Untrue Allegations

32. Any individual who makes an allegation in good faith which is not subsequently confirmed by the investigation, will;
- 32.1. have no action taken against them and
- 32.2. continue to have protection under this policy from victimisation or harassment.
33. If, however, an individual makes malicious or vexatious allegations, disciplinary action may be taken against them.

### Unfounded Allegations

34. Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the individual who raised the concern, who will be informed that the Senior Manager investigating deems the matter to be concluded and that it should not be raised again unless new evidence becomes relevant.

### Responding to concerns

35. THLT will always respond to concerns in a professional, fair and transparent way ensuring any actions taken are appropriate to the nature of the concern.
36. There will be an initial investigation and, depending upon the outcome of the findings, a more detailed investigation may be conducted. The procedures that will be taken in response to concerns shared are stated within Annex C.

### Taking the matter further

37. This policy is intended to provide an avenue to raise concerns not only within a school and then, if required, with the Trust but also within the Trust.
38. THLT endeavours to ensure that everyone using this process will be satisfied;
- 38.1. with the way concerns are treated and
- 38.2. how any investigations that may be carried out.
39. Anyone who is not satisfied by the processes and feels it is right to take the matter outside THLT, can raise matter with PCAW.
40. Every individual has the right to refer a concern to the Police if they suspect a criminal act.

### Roles and Responsibilities

41. The responsibility for the operation of this policy rests with the Executive Principal / CEO to ensure all staff are fully aware of its provisions.
42. The Executive Principal must be advised of all concerns raised, in a form which does not compromise or endanger confidentiality, so that a timely report to the Trust Board can be compiled.
43. The Executive Principal / CEO will report, in writing, annually to the Trust Board at the last Trust Board meeting of the academic year.



44. Further details of the roles and responsibilities of staff within schools and the THLT Trust are outlined in Annex D.

**Monitoring, Sharing and Publicising**

45. The THLT Trust has a responsibility for;
- 45.1. registering the nature of all concerns raised and
  - 45.2. recording the outcome.
46. On the conclusion of any investigation, the Senior Investigating Manager will provide a written report to the appropriate line manager and Head / Head of School.
47. An annual report, which will identify any patterns of concern and assess the effectiveness of the policy, will be presented to the Board of Trustees by the Executive Principle / CEO.
48. The Executive Principal will be responsible for;
- 48.1. monitoring the operation of this policy and
  - 48.2. keeping records of any concerns raised under it.
49. Records will be retained for 6 years from the date of the last action on a case and subsequently expunged.
50. This policy will be publicised on all Trust and school websites.
51. Every new employee will be made aware of the policy as part of their induction.

**Review**

52. This procedure will be kept under review and any amendments will be subject to consultation with appropriate members of THLT Community.

**Summary of key contacts**

53. In the first instance:
- 53.1. Executive Principal of THLT Academy Trust. **CEO@THLT.Academy**
  - 53.2. Chair of the Trust. **ChairofTrust@THLT.Academy**
  - 53.3. Public Concern at Work (PCAW) **0207 404 6609 / helpline@pcaw.co.uk**

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Jonathan Davis  
Trust Finance Director

Date: 10 Apr 23

**Annex A. Summary of procedures for raising concerns**

1. When an individual has a concern, they will need to identify the issues carefully.
2. They must be clear about the standards against which they are judging practice. Whilst not exhaustive they should consider the following:
  - 2.1. Is it illegal?
  - 2.2. Does it contravene professional codes of practice?
  - 2.3. Is it against government guidelines?
  - 2.4. Is it against the THLT guidelines?
  - 2.5. Is it about;
    - 2.5.a. one individual's behaviour or
    - 2.5.b. general working practices?
  - 2.6. Does it contradict what the employee has been taught?
  - 2.7. Has the individual witnessed the incident?
  - 2.8. Did anyone else witness the incident at the same time?
3. THLT will treat all such disclosures in a;
  - 3.1. confidential and sensitive manner and
  - 3.2. carry out an investigation in cases where no reasonable explanation can be provided.
4. The identity of the individual making the allegation will be kept confidential so long as it does not hinder or frustrate any investigation. It should be noted that the;
  - 4.1. investigation process may reveal the source of the information and
  - 4.2. the individual making the disclosure may need to provide a statement as part of the evidence required.
5. THLT will involve the;
  - 5.1. police in cases involving possible criminal activity and
  - 5.2. appropriate regulatory body where justified by the matter in hand.
6. In all cases, the individual raising the concern will be informed of;
  - 6.1. what action is to be taken and
  - 6.2. the outcomes of that action subject to any legal constraints.
7. THLT will do, what it lawfully can, to minimise any difficulties that an individual may experience as a result of raising a concern.
8. As a first step, a member of Community should normally raise concerns with their immediate manager or their manager's superior. This depends, however, on the seriousness and sensitivity of the issues and who is involved eg if an employee believes that their immediate manager or their manager's superior is involved, they should approach the Head / Head of School / CEO or Chair of Governors.
9. Any whistle-blower can;

- 9.1. by-pass the direct management line and the LAB if they feel the overall management and /or LAB is engaged in an improper course of action and
- 9.2. raise the concern directly to the Executive Principal.
10. After initially raising a concern verbally, it must be formally recorded in writing.
11. No formal action will be taken until a concern is raised in writing.
12. In the written report, the whistle-blower must;
  - 12.1. set out the background and history of the concerns,
  - 12.2. give names, dates and places and
  - 12.3. the reasons why they are particularly concerned about the situation.
13. If a whistle-blower does not feel able to put the concern in writing, they should telephone or meet the appropriate person.
14. It is important that however the concern is raised, the whistle-blower makes it clear that they are raising the issue via the whistle-blowing policy and procedure.
15. It is emphasised that the earlier an employee expresses the concern, the easier it is to act.
16. Although a whistle-blower is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.
17. In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf.
18. At each meeting under this policy the employee may bring a colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

**Annex B. Support when raising a concern; Possible Harassment or Victimisation.**

1. THLT recognises that the decision to raise a concern can be difficult, not least because of the fear of reprisals.
2. THLT will;
  - 2.1. not tolerate harassment or victimisation and
  - 2.2. take action to protect individuals who raise concerns.
3. If the individual subject to the allegation of concern is already the subject of disciplinary or redundancy procedures, those procedures will not be halted as a result of raising a concern under this policy.
4. It is the clear instruction to those investigating concerns raised under this policy that those who liaise with whistle-blowers must not release information to identify a whistle-blower unless it is required;
  - 4.1. within the investigation or
  - 4.2. to enable the allegation to be acted upon appropriately.
5. Details will only be disclosed to a precise person outside the THLT, when there is a legal requirement to do so eg a court order. The only exception to this shall be where the whistle-blower themselves gives written permission to do so.
6. Any person applying pressure upon anyone to identify whistle-blowers shall be subject to the same provisions as outlined below.
7. Where a whistle-blower alleges that they are / have been victimised / harassed as a result of raising a concern, that matter shall be reported to Executive Principal / CEO or Chair of Trust Board who will investigate these allegations.
8. Where an investigation may identify (either indirectly or directly) the whistle-blower;
  - 8.1. the way forward will be agreed with the whistle-blower and
  - 8.2. any resultant action reported, confidentially, to the Executive Principal / CEO or Chair of Trust Board who will be fully informed and consulted with throughout.
9. Each case will be considered on its merits. Anyone found to have victimised or harassed someone who has made a referral under this policy may be considered as a matter:
  - 9.1. of Gross Misconduct if done by an employee of the THLT and
  - 9.2. for THLT to consider termination of a contract if done by or at the request of a contractor.
10. If there are concerns that a contractor is victimising, or has victimised, a whistle-blower, an independent review may be requested.

### **Annex C. Procedures for responding to concerns**

1. The action taken by the Head / Head of School / Executive Principal / Chair of Governors will depend on the nature of the concern.
2. Where appropriate, the matters raised may:
  - 2.1. be investigated by management, internal audit or other appropriate person,
  - 2.2. be referred to the external auditor, Professional Body overarching agency,
  - 2.3. be referred to the police and / or
  - 2.4. form the subject of an independent inquiry.
3. To protect individuals, and the THLT, an initial investigation will be carried out to decide;
  - 3.1. whether a full investigation is appropriate and, if so,
  - 3.2. what form it should take.
4. Concerns or allegations, which fall within the scope of specific procedures eg child protection or discrimination issues, will normally be referred for consideration under those procedures.
5. It should be noted that some concerns may be resolved by agreed action without the need for investigation.
6. Some issues may be investigated without the need for initial enquiries. If urgent action were required, this would be taken before any investigation is conducted.

### **The Role of Senior Managers**

7. A Senior Manager may be informed by an employee about concern(s) and that they are "blowing the whistle" within the procedure in person; or in writing or over the phone.
8. The Senior Manager should respond immediately by arranging to meet with the employee to discuss the concern(s) as soon as possible.

### **Stage One**

9. At the initial meeting the Senior Manager should establish that:
  - 9.1. there is;
    - 9.1.a. genuine cause and
    - 9.1.b. sufficient grounds for the concern and
  - 9.2. the concern has been appropriately raised via the Whistle-blowing Policy.
10. The Senior Manager should ask the whistle-blower to put their concern(s) in writing if they have not already done so.
11. If the whistle-blower is unable to put any concerns in writing, the Senior Manager will;
  - 11.1. take down a written summary of the concern(s) and
  - 11.2. provide them with a copy immediately after the meeting as a record.
12. The Senior Manager should make notes of the discussions with the whistle-blower. The whistle-blower's letter and / or Senior Manager's notes must make it clear that the whistle-blower is raising the issue via the whistle-blowing policy and procedures and provide the:

- 12.1. background and history of the concerns,
  - 12.2. names, dates and places (where possible) and
  - 12.3. the reasons why the whistle-blower is particularly concerned about the situation.
13. The whistle-blower should be asked to date and sign their letter and / or the notes of any discussion.
14. The Senior Manager should positively encourage the employee to do this, as a concern expressed anonymously is less powerful and more difficult to address, especially if the letter / notes become evidence in other proceedings eg an internal disciplinary hearing.
15. The Senior Manager must;
- 15.1. follow the policy as set out above and
  - 15.2. explain to the whistle-blower;
    - 15.2.a. who they will need to speak to in order to determine the next steps eg The Head,
    - 15.2.b. what steps they (the Senior Manager) intend to take to address the concern,
    - 15.2.c. how they (the Senior Manager) will communicate with the whistle-blower during and at the end of the process. It should be noted that the need for confidentiality may prevent the school / trust giving the whistle-blower specific details of any necessary investigation or any disciplinary action taken as a result,
    - 15.2.d. that;
      - 15.2.d.i the whistle-blower will receive a preliminary written response within ten working days;
      - 15.2.d.ii their identity will be protected as far as possible, but should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed,
      - 15.2.d.iii the LAB will do all that it can to protect the employee from discrimination and / or victimisation;
      - 15.2.d.iv the matter will be taken seriously and investigated immediately,
      - 15.2.d.v if the whistle-blower's concern(s), though raised as a genuine concern, is not confirmed by the investigation, no punitive action will be taken against them;
    - 15.2.e. if clear evidence is uncovered during the investigation that they have made a malicious or vexatious allegation, disciplinary action may be taken against them and

- 15.2.f. the investigation may confirm their allegations to be unfounded in which case the LAB will deem the matter to be concluded unless new evidence becomes available.

**Stage Two**

- 16. Following the initial meeting with the whistle-blower, the Senior Manager should consult with the Chair of Governors to determine whether an investigation is appropriate and, if required, what form it should take.
- 17. A record should be made of;
  - 17.1. any decisions and / or actions agreed and
  - 17.2. the date and time the decisions were made.
- 18. It may be necessary, with anonymous allegations, to consider whether it is possible to take any further action. When making decision, Senior Managers and Chairs of Governors should take the following factors into account, the:
  - 18.1. the seriousness of the issue(s) raised,
  - 18.2. the credibility of the concern(s) and
  - 18.3. the likelihood of confirming the allegation(s) from attributable sources.
- 19. In some cases, it may be possible to resolve the concern(s) simply, by agreed actions or an explanation regarding the concern(s), without the need for further investigation.
- 20. Depending on the nature of the concern(s) it may be necessary for the concern(s) to:
  - 20.1. be investigated internally,
  - 20.2. be referred to the police,
  - 20.3. be referred to the external auditor, Professional Body / overarching agency and / or
  - 20.4. form the subject of an independent inquiry.
- 21. Senior Managers should have a working knowledge and understanding of other school policies and procedures eg grievance, disciplinary, harassment, child protection procedures, to ensure that concerns raised by employees are addressed via the appropriate procedure / process, including a disciplinary process if applicable.

**Stage Three:**

- 22. Within ten working days of a concern being received, the Senior Manager receiving the concern must write to the whistle-blower:
  - 22.1. acknowledging that the concern has been received,
  - 22.2. indicating how they propose to deal with the matter,
  - 22.3. giving an estimate of how long it will take to provide a final response,
  - 22.4. informing the employee whether any initial enquiries have been made,
  - 22.5. telling the employee whether further investigations will take place, and if not why-not and / or

- 22.6. letting the employee know when they will receive further details if the situation is not yet resolved

### **Raising Concerns Outside the Trust**

23. The aim of this policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace; in most cases the whistle-blower should not find it necessary to alert anyone externally.
24. The law recognises that in some circumstances it may be appropriate for the whistle-blower to report any concerns to an external body such as a regulator. It will extremely rarely, if ever, be appropriate to alert the media.
25. Whistle-blowers are strongly encouraged to seek advice, from within the school / THLT before reporting a concern externally. If a whistle-blower is not satisfied with a response, the Senior Manager should ensure that the individual is aware to whom the matter may be raised within the Trust as detailed above.
26. If the whistle-blower is still unhappy or feels unable to report the concern with the line manager / Senior Manager or Trust they can raise the concern externally with:
- 26.1. Public Concern at Work,<sup>1</sup>
  - 26.2. a recognised Trade Union,
  - 26.3. the External Auditor,
  - 26.4. a relevant professional bodies or regulatory organisations or
  - 26.5. a solicitor.
27. The Senior Manager must stress to the whistle-blower that if they choose to take a concern outside the Trust, it is the whistle-blower's responsibility to ensure that confidential information is not disclosed ie confidential information, in whatever format, is not handed over to a third party.

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<sup>1</sup> \*Public Concern at Work is a registered charity that employees can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns.



## **Annex D.**

### **Roles and responsibilities**

1. Investigations should be undertaken by an appropriate Senior Manager / Trustee with relevant expertise to lead the investigation and will be dependent upon the issue raised.
2. The agreed investigator and Trust Operations Officer (TOO) will jointly ensure that investigations are swift and effective and undertaken by someone with relevant skills and experience.
3. The TOO will maintain records of all referrals and subsequent investigations received by the THLT.

### **Additionally:**

4. The Reporting Officer (RO), or another Trustee appointed by the Trust Finance Committee, will lead on all financial referrals, including those where there are significant financial implications to an allegation, whilst not explicit within the referrals.
5. Any appointment to a financially related investigation must be recorded in the minutes of the Finance Committee.
6. The RO, or duly appointed Trustee, will ensure that concerns raised through the informal process are logged and trends identified.
7. The TOO, with external HR support if required, will advise and support employees involved in the investigation process to ensure that such processes are fair and supportive to all those involved.
8. **Employees.**
  - 8.1. In all contracts of employment there is an implied understanding of mutual trust and confidence between the employer and employee.
  - 8.2. All employees have a responsibility to raise concerns about work; they may do so in the manner described in this policy.
9. **Line managers.**
  - 9.1. Line managers must;
    - 9.1.a. create an open and fair culture within their area of responsibility and
    - 9.1.b. ensure that staff concerns are listened to and action taken where necessary.
  - 9.2. Line managers are responsible for ensuring that there is;
    - 9.2.a. a safe environment for staff to raise their concerns and
    - 9.2.b. no retribution arising from someone raising their concerns.
10. **Executive Principal.**
  - 10.1. The Executive Principal / CEO is responsible for;
    - 10.1.a. assuring that the risks across THLT are being identified and managed,
    - 10.1.b. ensuring that;
      - 10.1.b.i this policy is robust in identifying concerns,
      - 10.1.b.ii the identified risks are addressed and
      - 10.1.b.iii the principles within this policy are upheld.