



**St Lawrence
Academies Trust**
Stronger Together

WHISTLE BLOWING POLICY

Approved	For Review
October 2024	December 2027



**St Lawrence
Academies Trust**
Stronger Together

Community

Integrity

Aspiration

Hope

Within the Trust we strive to create a learning environment, curriculum, experiences and relationships in which all individuals can find expression, be nourished and developed.

The staff and directors of St Lawrence Academies Trust seek to run all aspects of academy business and activity with full regard for high standards of conduct and integrity. In the event that members of Trust staff, parents, directors or the Trust community at large become aware of activities which give cause for concern, St Lawrence Academies Trust has established the following whistle blowing policy, or code of practice, which acts as a framework to allow concerns to be raised confidentially, and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term whistleblower denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan, as recommended in the Second Report on the *Committee on Standards in Public Life: Local Spending Bodies*, published in May 1996.

The Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The Trust recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within the Trust environment but also has recourse to an external party outside the leadership structure of the Trust.

The Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

The provisions of this policy apply to matters of suspected fraud and impropriety and not to matters of more general grievance, which would be dealt with under the academy's grievance procedures.

When might the whistle blowing policy apply?

The type of activity or behaviour which St Lawrence Academies Trust considers should be dealt with under this policy includes:

- Manipulation of accounting records and finance
- Inappropriate use of academy assets or funds
- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of academy procedures which may advantage a particular party (for example, tampering with tender documentation, failure to register a personal interest)

What action should the whistleblower take?

The Trust encourages the whistleblower to raise the matter internally in the first instance, to allow those internal staff, directors and those in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

The Trust has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter. Below is a list of those individuals to be contacted.

Name	Position	Contact Details
Mike Adnitt	CEO	madnitt@slatrust.co.uk 01724 747310
Tony Wood	CFO	twood@slatrust.co.uk 01724 747310

The whistle blower may prefer to raise the matter in person, by telephone or in written form marked 'private and confidential' and addressed to one of the above named individuals. All matters will be treated in strict confidence, and anonymity will be respected wherever possible.

Alternatively, if the whistle blower considers the matter too serious or sensitive to raise within the internal environment of the Trust, the matter should be directed in the first instance to the following members:

Bishop David Court Chair of Directors bishop.grimsby@lincoln.anglican.org 01522 50 40 90

St Lawrence Academies Trust would prefer that a serious concern is raised responsibly rather than not at all. Despite the assurances, the whistleblower may feel that it is more appropriate to raise the concern with an external organisation, such as a regulator. It is, of course, open for them to do so, provided they have sufficient evidence to support the concern. The Trust strongly advises that before reporting the concern externally, the whistleblower seeks advice from the following.

Protect, a registered charity which advises on serious malpractice within the workplace, can be contacted on 020 3117 2520.

How will the matter progress?

The individual(s) in receipt of the information or allegation (the investigating officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance: for example, the involvement of other members of Trust staff, legal or personnel advisors, the police and the directors.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer(s), possibly in conjunction with the directors, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third party referral, such as the police.

The whistleblower will be informed of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to the directors.

If the whistleblower is not satisfied with the outcome of an investigation, the Trust would prefer that the whistleblower raised this with them or the directors, explaining why this is the case. The concern will be looked at again if there is good reason to do so.

If the whistleblower is dissatisfied with the conduct of the investigation, or resolution of the matter, or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the directors.

Respecting confidentiality

Wherever possible, St Lawrence Academies Trust seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. The Trust will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances. The Public Interest Disclosure Act became law in 1999 and gives a "worker" the right not to be victimised or dismissed because he or she has made a protected disclosure.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns, with the knowledge they will be taken seriously. If individuals raise malicious, unfounded concerns, or attempt to make

mischievous, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

Conclusion

Existing good practice within the Trust in terms of its systems of internal control, both financial and non-financial, and the external regulatory environment in which the Trust operates, ensure that cases of suspected fraud or impropriety rarely occur. This whistle blowing policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and, if necessary, outside the leadership structure of the Trust. This document is a public commitment that concerns are taken seriously and will be actioned.

Review

In order to ensure that it reflects current best practice, this policy will be reviewed every year. Directors will formally review every three years the next review date is: December 2024