



## Whistleblowing Policy

### Introduction

CSTN SCITT is committed to the highest standards of openness, honesty, probity and accountability. In line with that commitment, we encourage our employees and trainees who have serious concerns about any aspect of the SCITT's work, to come forward and voice those concerns, without judgement, reprisal or harassment.

As an employee or trainee of the SCITT, you may be the first to realise that there may be something seriously wrong within the organisation. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may also fear harassment or victimisation and think it may be easier to ignore the concern rather than report it.

CTS N SCITT recognises that there may be certain cases will have to proceed on a confidential basis. This policy makes it clear that staff can do so without fear of reprisals. This Whistleblowing Policy is intended to enable staff and trainees of the SCITT to raise serious concerns rather than overlooking a problem or discussing it externally.

### What is Whistleblowing?

CTS N SCITT has existing procedures in place to enable you to lodge a grievance relating to your own employment or training with the SCITT. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures [although the SCITT reserves the right to determine which procedure is appropriate].

Concerns to be reported under this policy may relate to something which involves an issue in the public interest and which you have reasonable belief to be true. This may include:

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Bribery;
- Financial fraud or mismanagement;
- Negligence;
- Breach of SCITT internal policies and procedures;
- Conduct likely to damage the SCITT reputation;
- Unauthorised disclosure of confidential information;

- Concerns about the harm or risk of harm to children;
- The deliberate concealment of any of the above matters.

This policy applies to all individuals involved at all levels of the SCITT; employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers and volunteers.

## When does the policy apply?

If your concern relates to an incident within your host / placement school then you should follow the procedure of the whistleblowing policy of that school. If it relates to a concern the Core training and / or work of the SCITT then follow this policy. If you are unsure ask your Hub Lead / manager.

## Safeguards

### Protecting the whistleblower

Under the Public Interest Disclosure Act 1998 a whistleblower is protected from detriment and unfair dismissal. The SCITT will support and not discriminate against concerned staff or trainees who apply the Whistleblowing procedure, provided any claim is made in good faith, even if they turn out to be mistaken.

### Protection from reprisal

The SCITT 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 malpractice. CTSN SCITT will not tolerate harassment or victimisation and will take action to protect you when you raise a concern which you have reasonable belief to be true and to be in the public interest. This will include disciplinary action against those that subject an individual to detriment as a result of the whistleblowing. This does not necessarily mean that if you are already the subject of procedures such as disciplinary, improving performance, grievance or managing attendance, that those procedures will be halted as a result of your whistleblowing.

Where feasible, you will be contacted when your concern has been investigated to ascertain whether you have suffered any detriment as a result of your whistleblowing. If at any time, either during or after the investigation, you feel that you have suffered any detriment as a result of your whistleblowing you should contact your line-manager, programme lead, the SCITT Director, Senior Leadership team or your union.

Everything possible will be done to manage employment/training relationships following a genuine and reasonable concern being raised.

### Confidentiality

CTSN SCITT treats the details of all whistleblowers in confidence and will not intentionally divulge your identity without your consent. However, it must be appreciated that the investigation process may reveal the source of the information without us revealing your identity directly, and in some circumstances a statement by you may be required as part of the evidence.

### Anonymous allegations

Allegations can be made anonymously. However, this policy encourages you to put your name to your allegation, as concerns expressed anonymously are often much more difficult to investigate. An

example may include the need to contact you to obtain further information or verify the details you have already provided.

Anonymous allegations will be considered wherever possible at the discretion of the SCITT. The factors to be taken into account when determining whether an investigation in such a case can proceed would include:

- the seriousness of the issues raised;
- if the allegations pertain to other policies and therefore should be dealt with in accordance with alternative procedures, for example allegations management and child protection;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other, attributable sources.

### Untrue allegations

If you make an allegation in the public interest and which you had a reason to believe was true, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations which you could not have reasonably believed was true, appropriate action may be taken against you including disciplinary action.

### When should whistleblowing procedures be used?

If a member of staff or trainee has concerns about wrongdoing at the SCITT and feels that those concerns are sufficiently serious to require reporting, this procedure outlines what should be done.

Each individual member of staff or trainee should feel able to speak freely on such matters. However, CTSN SCITT and colleagues have the right to protect themselves against unfounded false or malicious accusations.

Whistleblowing should only be used when the party implementing the procedure (Representor) has reasonable grounds for believing that a serious offence has been or may be committed. It must never be used without good grounds, falsely or maliciously.

Whistleblowing is not appropriate for dealing with issues between a member of staff or trainee and the SCITT which relate to their own employment/training or rights of employment/training conditions generally.

Whistleblowing is not appropriate to specific cases of child safety or safeguarding which will be dealt with under the procedures specified in that connection.

### The procedure

Any issue raised will be kept confidential while the procedure is being used.

The Representor (the person raising the concern) should raise their concern with their line manager/Senior Tutor. This may be done orally or in writing. Staff and trainees are discouraged from making anonymous disclosures as this may make the investigation difficult or impossible to conduct.

However, if the concern relates to:

- the Representor's line manager / Senior Tutor or any person to whom he or she reports, the Representor should raise the issue with one of the Programme Leads
- the Programme Leads, the Representor should raise the matter with the SCITT Director.
- The Director, the Representor should raise the matter with the other SCITT Senior Leadership Team.

The person with whom the matter is raised is referred to as the "Assessor".

The Assessor will:

- Interview the Representor as soon as possible within seven working days, in confidence. Early interview will be essential if the concern relates to an immediate danger to loss of life or serious injury or risk to pupils;
- Obtain as much information as possible from the Representor about the grounds for the belief of wrongdoing;
- Consult with the Representor about further steps which could be taken;
- Advise the Representor of the appropriate route if the matter does not fall under this Procedure;
- Other than in the case where the concern is about the Director, report all matters raised under this procedure to the Director.

At the interview with the Assessor, the Representor may be accompanied by a recognised trade union representative, a work colleague or mentor who must respect confidentiality of the disclosure and any subsequent investigation. The Assessor may be accompanied by a member of the SCITT staff to take notes which will be made available after the meeting and propose how to deal with the matter.

The Assessor may at any time disclose the matter to a professionally qualified lawyer for the purpose of taking legal advice. The Assessor may also discuss the issue, in confidence, to other suitable professionals, such as independent HR consultants or Trust governance providers in order to assess the nature of the case and to inform the outcome of the investigation.

Promptly within ten working days of the interview, the Assessor will recommend one or more of the following:

- The matter be further investigated internally by the SCITT;
- The matter be further investigated by external consultants appointed by the SCITT;
- The matter be reported to an external agency;
- Disciplinary proceedings be implemented against a member of staff or trainee ;
- The route for the Representor to pursue the matter if it does not fall within this procedure;  
or
- That no further action is taken by the SCITT.

The grounds on which no further action is taken include:

- The Assessor is satisfied that, on the balance of probabilities, there is no evidence that wrongdoing within the meaning of this procedure has occurred, is occurring or is likely to occur;
- The Assessor is satisfied that the Representor is not acting in good faith;
- The matter is already (or has been) the subject of proceedings under one of the SCITT's other procedures or policies;
- The matter concerned is already (or has been) the subject of legal proceedings or has already been referred to an external agency.

The recommendation of the Assessor will be made to the Director. However, should it be alleged that the Director is involved in the alleged wrongdoing; the recommendation will be made to the Senior Leadership Team.

The Director or Senior Leadership Team, as appropriate, will ensure that the recommendation is implemented unless there is good reason for not doing so in whole or in part. Such a reason will be reported to the next meeting of the Senior Leadership meeting.

The Representor's identity will be kept confidential unless the Representor otherwise consents or unless there are grounds to believe that the Representor has acted maliciously. In the absence of such consent or grounds, the Assessor will not reveal the identity of the Representor except:

- Where the Assessor is under a legal obligation to do so;
- Where the information is already in the public domain; or
- On a legally privileged basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

The conclusion of any agreed investigation will be reported by the Assessor to the Representor promptly within 28 working days of the initial interview.

All responses to the Representor will be made in writing and sent to the Representor's home address.

If the Representor has not had a response within the above time limit or such reasonable extension as the SCITT requires, the Representor may go to an appropriate external agency but will inform the Assessor before doing so.

The Representor may at any time disclose the matter on a legally privileged basis to a professionally qualified lawyer for the purpose of taking legal advice.

## Malicious accusations

A deliberately false or malicious accusation made by a Representor is a disciplinary offence and will be dealt with under the SCITT's disciplinary procedure, as well as potentially exposing the Representor to legal liability.

## Confidential enquiries

Staff and trainees may, on a confidential basis seek prior guidance from the Programme Leads or Director if they wish to establish whether any course of conduct on their part or on the part of another member of staff or trainee may amount to wrongdoing under these procedures. Such enquiry shall be kept confidential. The Director will attempt to provide guidance on the basis of the information provided, but such guidance shall not prejudice the rights of the SCITT or any person under these procedures.

## Monitoring, evaluation and review

Senior Leadership Team will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout CTSN SCITT.

## This policy should be read in conjunction with the CTSN SCITT's:

- Equality and Diversity Policy

- Complaints Policy
- Data Protection Policy
- Trainee Code of Conduct

This Whistleblowing Policy will be reviewed every three years.

Policy review date: Spring Term 2024