



## WHISTLEBLOWING (CONFIDENTIAL REPORTING) POLICY

### 1. Introduction

The Methodist Independent Schools Trust (MIST) and MIST Schools are committed to conducting their business with honesty and integrity and we expect all staff to maintain high standards. MIST is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise such matters with full confidence that they will be dealt with properly. Any suspected wrongdoing should be reported as soon as possible. Individuals are encouraged to come forward with genuine concerns, in the knowledge that any concerns will be taken seriously.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and in accordance with these whistleblowing procedures. Where malicious, unfounded concerns are raised, or attempts are made to cause mischief, this will also be taken seriously and may lead to disciplinary action or another penalty appropriate to the circumstances.

Throughout this policy the term “Whistleblower” denotes the person raising the concern or making the complaint. This policy covers all MIST employees, officers, consultants, contractors, casual workers, and agency workers (referred throughout the document as “staff”), MIST trustees, school governors and volunteers.

### 2. What is whistleblowing (Confidential Reporting)?

Whistleblowing (or Confidential Reporting) is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It may also include child protection and/or safeguarding concerns or serious breaches of the Trust or school’s internal policies and procedures including its Code of Conduct. It would also include poor handling of safeguarding concerns about children or adults, poor or unsafe safeguarding practice and/or disclosure in relation to deliberate concealment of such matters.

A ‘whistleblower’ is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Trust or School’s activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to Staff’s own personal circumstances, such as the way an employee or volunteer has been treated at work. In such cases the Grievance Policy and Procedure should be followed.

### 3. When might the Whistleblowing Policy apply?

MIST considers that the following types of activity or behaviour should be dealt with under this policy:

- Manipulation of accounting records and finances
- Serious breaches of safeguarding policies and procedures
- Poor or unsafe practice in relation to the handling or recording of safeguarding concerns.
- Inappropriate use of MIST’s assets or funds (including schools’ assets or funds)



- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of procedure, which may advantage a particular party or any actions likely to bring the reputation of MIST or the Methodist Church into question.

NB: This is not an exhaustive list. If School Staff are uncertain whether something is within the scope of this policy, they should seek advice from the Headteacher and if the matter is in relation to an alleged wrongdoing by the Headteacher then Staff should seek the advice of the Chair of Governors. If the concern is with a member of the Governors, the staff member can contact the General Secretary of MIST (020 7935 3723; [gensec@methodistschools.org.uk](mailto:gensec@methodistschools.org.uk)). If the concern is about the General Secretary, then the matter should be referred to the Chair of MIST.

If MIST employees, officers, contractors, etc., are unsure what action they should take, they may contact the General Secretary of MIST (as above) or, if the concern is about the General Secretary, the Chair of MIST.

#### **4. What action should a Whistleblower take?**

MIST encourages the Whistleblower to raise the matter internally, in the first instance, to allow those in positions of responsibility and authority the opportunity to investigate and give an explanation for the behaviour or activity. To whom the concerns should first be raised depends on the nature of the concern (e.g. financial concerns), the place of that concern (e.g. school or Trust) and the person(s) of concern (school staff, Head, Governor, MIST executive staff, MIST Trustee).

The Whistleblower can raise the matter in person, by telephone, or in writing. All matters will be treated in strict confidence and requests for anonymity will be respected wherever possible. Anonymous disclosures are difficult to investigate. If you want to raise your concern anonymously, we will make every effort to keep your identity secret and only reveal it where necessary to comply with a legal obligation and/or to those involved in investigating your concern.

*All concerns except those related to safeguarding or child protection*

For any concerns not related to child protection or safeguarding, the concerns could be raised with any of the following individuals. The Whistleblower should decide who would be the most appropriate person to deal with the matter:

- Line Manager
- Headteacher
- Chair of Governors
- MIST's General Secretary
- The Chair of MIST

*Concerns related to safeguarding and/or child protection*

The safety and wellbeing of children in our schools is dependent on the vigilance of all our trustees and staff and their prompt communication to the DSL, Head or MIST General Secretary of any safeguarding concerns, no matter how small.



All trustees, staff, contractors and volunteers in MIST and our Schools have a duty to report all safeguarding concerns and it is crucial that they do so. In particular, they must comply with 'Keeping children safe in education' (September 2021), which includes reporting concerns about (a) children; (b) adults working with children; and (c) poor or unsafe practice and potential failures in the schools' or MIST's safeguarding procedures.

This section should be read in conjunction with:

- MIST's and/or individual schools' safeguarding policies
- Keeping Children Safe in Education (September 2021)
- What to do if you are worried a child is being abused (DfE March 2015)
- Local area safeguarding and child protection procedures

If you have a safeguarding concern you should, in the first instance, follow the relevant school's or MIST's safeguarding policy.

If you are not satisfied with the way in which your concern is being dealt, you should escalate your concern to:

- MIST General Secretary
- MIST Safeguarding Trustee ([beaston@methodistschools.org.uk](mailto:beaston@methodistschools.org.uk)); or
- The Trust's independent safeguarding consultant ([carolyn.eyre@btinternet.com](mailto:carolyn.eyre@btinternet.com))

**If at any stage you are concerned about the way in which your safeguarding concern is being handled, or if you do not feel comfortable raising it internally, you can contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).**

**If a child is in immediate danger or at risk of harm a referral should be made to children's social care and/or the police immediately. The DSL will ordinarily make external referrals, but anyone can make a referral directly.**

#### **5. How will the matter be progressed?**

The individual(s) in receipt of the whistleblowing concern will first decide at which level (e.g. School or Trust or external agency) the concern should be dealt with and either refer or appoint an investigating officer to carry out a preliminary investigation, to establish the facts of the matter and assess whether:

- a) The concern has foundation
- b) The matter can be resolved internally

The preliminary fact finding may identify the need to involve third parties to provide further information, advice, or assistance (e.g. other members of staff, legal or personnel advisors, local authority social care and/or police). Arrangements will then be put in place for the investigation to be carried out promptly.

Where the initial fact finding indicates that an offence or offences may have been committed against a child or children, or there is a risk of harm, advice will be sought from the local authority and/or police.

At the end of the investigation, the Investigating Officer will write a report of the evidence gathered and make recommendations to the appointing person. The appointing person will then consider how best to proceed with the findings and what corrective action needs to be



taken. This may include some form of disciplinary action or a referral to a third party, such as the police.

The Whistleblower will be informed, in writing, of the outcome of the investigation and the action taken to address the matter.

#### **6. What happens if the Whistleblower remains unsatisfied?**

If the Whistleblower is dissatisfied with the conduct of the investigation, the resolution of the matter, or has genuine concerns that the matter has not been handled appropriately, the concerns should be put in writing, to the Deputy Chair of MIST, within 10 working days (or if the concern is about the Deputy Chair of MIST, he/she should contact the Chair of MIST).

The Deputy Chair of MIST will appoint a panel to consider all the evidence and make a decision. The Whistleblower will then be informed in writing, with a reasoned statement, of the decision made. This decision will be final.

Should the allegation prove to be malicious in intent, the Whistleblower may be subject to disciplinary proceedings.

#### **7. External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally. However, the law recognises that in some circumstances it may be appropriate for concerns to be reported an external body, e.g. NSPCC (see above), DfE, Charity Commission, ISI, LADO or police. Public Concern at Work operates a confidential helpline that will help a whistleblower decide whether an external disclosure is appropriate. Their contact details are at the end of this policy.

#### **8. Protection and support for whistleblowers**

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform [the Head or Chair of Governors, General Secretary or Chair of MIST immediately. [If the matter is not remedied you should raise it formally using the Grievance Procedure.]

Anyone who makes threats against a whistleblower in any way, will be subject to disciplinary action.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

In case of any doubt, staff, governors, trustees can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this document.

#### **9. Role of the Audit Committee**

As part of its risk management monitoring function, the Audit Committee will receive, annually, a report on the operation of this policy.



#### 10. Useful links

**Public Concern at Work: 020 7404 6609; [www.pcaw.co.uk](http://www.pcaw.co.uk) ; [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk) NSPCC:  
whistleblowing helpline 0800 028 0285**

**Charity Commission Guidance CC47 – Complaints about Charities**

MIST's Privacy Notices can be accessed via [www.methodistschools.org.uk/privacy\\_notices](http://www.methodistschools.org.uk/privacy_notices).  
MIST is committed to ensuring data subjects' privacy rights and will process personal and special category data according to the accepted privacy principles.