



Haberdashers' West Midlands Academies Trust

WHISTLEBLOWING POLICY

(As set out in the HWMAT Finance Manual)

2023-2026

Haberdashers' Abraham Darby

Haberdashers' Adams

WHISTLE BLOWING POLICY	
Named Responsibility of Policy	Mr L Hadley, Principal, Haberdashers' Abraham Darby Mr G Hickey, Headteacher, Haberdashers' Adams
Date of Policy	July 2023
Date of next Review	July 2026
Governor Accountability	Board and Finance Committee
This policy will be readily accessible to Parents/Carers/Staff/Visitors/Members of the Public through the school websites	

COMMITMENT TO REVIEW

This Policy will be monitored and reviewed every three years by the relevant policy owners named above and/or in light of any regulatory changes or guidance that may occur during the period or any changes to National Curriculum requirements and/or DfE guidance/regulations.

Any changes will be evaluated and approved by the Governing Body

The Haberdashers' West Midlands Academies Trust (HWMAT) is committed to the concept of whistleblowing as a means of tackling fraud and other forms of malpractice. Staff, governors, parents and the schools' community at large are encouraged to raise concerns without prejudice to their personal position.

HWMAT recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the schools.

The provision of this policy applies to matters of suspected fraud and impropriety and not matters of more general grievance which would be dealt with under normal grievance procedures. If individuals raise malicious unfounded concerns or attempt to make mischief, this will be taken seriously and may constitute a disciplinary offence.

The type of activity or behaviour, which should be considered under this policy, includes:

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

HWMAT encourages the whistleblower to raise the matter internally in the first instance to allow those School staff and Governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity.

HWMAT 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. The names, addresses and telephone numbers of the following nominated persons are all available in the schools' telephone directories:

- Headmaster/Principal
- Chief Financial Officer
- Chair of Governors

The whistleblower 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 whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed to the Department for Education.

In addition, information can be obtained from the charity, Protect, which offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation. Contact details are as follows:

Protect
The Green House
244-254 Cambridge Heath Road
London
E2 9DA
Tel: 020 3117 2520

Whichever agency is contacted, the matter will be progressed as follows:

The investigating officer will carry out a preliminary investigation; caution is needed to avoid prejudicing any criminal enquiry, to assess whether the concern has foundation. This assessment may identify the need to involve third parties to provide further information or assistance, for example other members of School staff, the schools' external auditors, legal or personnel advisors, the police, the Department for Education.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer, possibly in conjunction with the governing body, 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. If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter, the concerns should be raised with the investigating officer and the governing body.

Existing good practice within HWMAT in terms of systems of internal control both financial and non-financial and the external regulatory environment in which HWMAT operates are designed to ensure that cases of suspected fraud or impropriety rarely occur. This whistleblowing policy is provided to establish a framework within which issues can be raised confidentially internally and if necessary, outside the management structure of both Schools.