

Whistleblowing Policy

1. Overview

Emil Dale Part Time (EDSA)*** is committed to maintaining the highest standards of openness, probity and accountability.

****In this policy, the abbreviation of EDSA will be used.*

We seek to operate in a responsible, transparent manner, taking into account the requirements of the seven principles of public life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

EDSA encourages an environment where staff and students alike feel respected, safe and welcome. That being said, we are aware that wrongdoing does happen. And where and when it does, it is vital that we are made aware so that we may seek to put things rights, address any weaknesses in systems and processes, and take appropriate action.

**Emil
Dale**
PART TIME

2. Aims and Purpose

This policy has been created to promote, establish and encourage openness, integrity and accountability, and to tackle wrongdoing.

This policy and the procedure that will follow enables staff and students to raise concerns internally, under strict confidentiality, about malpractice, fraud, health and safety, criminal offences, miscarriages of justice, inappropriate behaviour, unethical conduct or a failure to comply with legal obligations.

This Whistleblowing Policy is one element of a wider set of arrangements we have in place to uphold high standards and prevent wrongdoing. It is not a substitute for the normal processes but in addition to them. This is not to be seen as a substitute to existing procedures and should only be implemented when all other existing internal procedures are felt to be inappropriate, or if the person in question feels they cannot speak to the Emil Dale Part Time Manager, or in the case of a student, their relevant Animation Team member.

The policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that EDSA will take their concerns seriously. Concerns will be thoroughly investigated, and confidentiality will be respected.
- Let all students and staff of EDSA know how to raise concerns about potential wrongdoing happening at EDSA.
- Set clear procedures for how EDSA will respond to such concerns.
- Let all individuals know that protection will be available to them should they raise a whistleblowing concern.
- Assure individuals that they will not be victimised for raising a legitimate concern through the steps set out in this policy, even if they turn out to be mistaken.
 - *Please note that vexatious or malicious concerns may be considered through EDSA's Disciplinary Policy.*

3. Scope

While this policy is specifically designed for staff directly employed by ESDA, including hourly paid workers, Animation Team members, and students, any individual with a serious concern about malpractice or serious wrongdoing in any way can make a claim.

This policy is not designed to question financial, or business decisions taken by ESDA, nor may it be used to reconsider matters that have been addressed under the EDSA Complaint Procedure, and the Disciplinary Procedure. It is not an alternative mechanism for students to raise matters relating to their own learning or that of their peers.

4. Definitions

What is whistleblowing?

Whistleblowing is the act of disclosing information that relates to suspected wrongdoing or danger within the workplace. It covers concerns made that are 'in the public interest' Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staffs' health and safety being but in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Damage to the environment
- Academic malpractice
- Breach of contract
- Negligence
- Improper conduct or unethical behaviour
- Attempts to cover up the above, or any other wrongdoing in the public interest

A 'whistleblower' is a person that, in good faith, raises a genuine concern relating to wrongdoing or danger affecting any stream of EDSA, teaching members, or students.

If the whistleblower is a member of EDSA and is under-16, EDSA hold a right to contact the member's named emergency contact and will communicate all further procedures mentioned in this Policy to them rather than to the EDSA member.

If the whistleblower is a member of EDSA and is over-16, EDSA will communicate all further procedures mentioned in this Policy to both the individual and to the member's named emergency contact.

Not all concerns count as whistleblowing. For example, personal grievances such as bullying or harassment do not usually count as whistleblowing. If something affects an individual, or relates to an individual's employment contract, this is likely a grievance.

When an individual has a concern, they should consider whether it would be better to follow EDSA's grievance or complaints procedures.

5. Procedure

When to raise a concern

Individuals should consider the examples in Section 4 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

Who to report to

Staff should report their concern to the Emil Dale Part Time Manager. If reported to the Emil Dale Part Time Manager, they should immediately report this to the Emil Dale Academy Business, Compliance & Strategy Manager. If the concern is about the Emil Dale Part Time Manager, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Emil Dale Academy Principal*.

Students should report their concern to their Animation Team member. If reported to an Animation Team member, the Animation Team member should immediately report this to the Emil Dale Part Time Manager. If the concern is about the Emil Dale Part Time Manager, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to Emil Dale Academy Principal*.

**Emil Dale Academy Principal – Victoria Hammond*

How to raise the concern

Concerns should be made in writing wherever possible; this includes the use of email. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

Investigating the concern

When a concern is received by the Emil Dale Part Time Manager, or the Emil Dale Academy, referred to from here as the 'recipient' - they will:

- Meet with the person raising the concern within a reasonable time.
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. As Section 2 states, if the concern is found to be malicious or vexatious, further action may be taken.
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the Emil Dale Academy Principal and/or the Emil Dale Academy Business, Compliance and Strategy Manager, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
 - The individual who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

Outcome of the investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the individual who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the Emil Dale Part Time Manager, Emil Dale Academy Principal and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. EDSA will always aim to deal with concerns fairly and in an appropriate way.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and rectifying any safety concerns. In most cases, there is no need for an individual to alert anyone externally. It will very rarely, if ever, be appropriate to alert the media. EDSA strongly encourages individuals to seek advice before reporting a concern to any external body. The independent whistleblowing charity, Public Concern at Work operates a confidential helpline. Where possible, individuals are encouraged to report all issues internally first.

Version Number	Date of Issue	Review Date	Author	Changes made/detail
1	11 November 22	July 23	Eden Tinsey	First issue