



preparing the way for others to follow

WHISTLEBLOWING POLICY AND ALLEGATIONS AGAINST STAFF PROCEDURES

Key document details

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WHISTLEBLOWING POLICY AND PROCEDURES

1. Introduction

1.1 Pioneer Educational Trust (the Trust) is committed to the highest possible standards of openness, honesty, integrity and accountability. As part of this commitment the Trust is keen that activity which falls below these standards is reported to the Trust in order that it can be dealt with promptly. The Trust acknowledges that employees are often the first to realise that there may be something seriously wrong within their organisation and that the Trust needs to encourage employees and others with concerns about any aspect of the Trust's work to come forward and voice those concerns. Officially this is called 'making a disclosure in the public interest' under the Public Interest Disclosure Act 1998 (PIDA).

Qualifying disclosures under the act are disclosures of information where the employee reasonably believes **(and it is in the public interest)** that one or more of the following matters is either happening, has taken place, or is likely to happen in the future.

- A criminal offence (e.g. fraud, corruption etc.)
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above.

In addition to the 6 criteria above which are specified in the PIDA, the Trust encourages employees to disclose any concerns they have regarding

- Public funds being misused
- The Trust's procedures (e.g. Code of Conduct, Financial Regulations) has been or is being breached by members/and/or employees
- Abuse (e.g. physical, sexual)
- Discrimination to any employee or service recipient e.g. disability, race etc.

1.2 You, as a Trust employee, may be worried about raising such issues or may want to keep the concerns to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation. You may also fear harassment or victimisation. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

1.3 The Trust has implemented this Whistleblowing Policy to enable you to raise your concerns about such malpractice at an early stage and in the right way. We would rather that you raised the matter when it is just a concern rather than wait for proof. The Whistleblowing Policy is intended to encourage and enable you, as an employee, to raise serious concerns within the Trust rather than overlooking a problem or simply reporting it outside. It should be read in conjunction with the Code of Conduct already issued to employees.

1.4 If something is troubling you, which you think we should know about or look into, please use this policy. Don't ignore the concern. If, however, you have a grievance about your own personal position or employment, please use the Trust's Grievance Procedure which you can get from your manager, or from the staff drive. This Whistleblowing Policy is primarily for concerns where the interests of others or the organisation itself are at risk.

2. Aims

2.1 This policy aims to:

- encourage employees to feel confident in raising serious concerns;
- reassure employees that, when they raise any concerns and reasonably believe them to be true, i.e. "whistle blow", they will be protected from reprisals or victimisation;
- provide avenues for an employee to raise concerns and receive feedback on any action taken;
- ensure that employees get a response to the concerns they have raised from the Trust and, if not satisfied, show how they may take the matter further if they are dissatisfied with the response.

3. Scope

3.1 This policy may be used by all employees in the Trust. This includes permanent and temporary employees of the Trust, agency employees and Trust employees seconded to a third party.

3.2 It is not intended that this policy, and its associated procedures, be used to raise concerns which fall within the scope of other Trust procedures where more appropriate procedures are available, for example:

- grievances (see Grievance Policy);
- child protection issues (see Child Protection Policy).

4. Safeguards

Harassment or Victimisation

4.1 The Trust 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. The Trust will not tolerate harassment or victimisation and will take action to protect you when you raise a concern. If you raise a genuine concern under this policy, you will not suffer any detriment in connection with your employment.

4.2 Employees who 'blow the whistle' on wrongdoing in the workplace can claim unfair dismissal if they are dismissed or victimised for doing so. An employee's dismissal (or selection for redundancy) is automatically considered 'unfair' if it is wholly or mainly for making a protected disclosure.

Confidentiality

4.3 The Trust will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. If you ask us to protect your identity by keeping your confidence, we will not disclose it

without your consent or unless instructed by a Tribunal or Court. If the situation arises where we are not able to resolve the concern without revealing your identity (e.g. a statement by you may be required as part of the evidence) we will discuss with you whether and how we can proceed.

Anonymous Allegations

- 4.4 This policy strongly encourages you to put your name to your allegation. Concerns expressed anonymously will be much more difficult for us to look into or to protect your position or to give you feedback. Concerns raised anonymously are much less powerful and less likely to be effective, but they will be considered at the discretion of the Trust.
- 4.5 In exercising discretion, the factors to be taken into account would include:
- the seriousness of the issues raised;
 - the credibility and plausibility of the concern; and
 - the likelihood of confirming the allegation from attributable sources.

Untrue or Malicious Allegations

- 4.6 If you make an allegation, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, disciplinary action may be taken against you.

5. How to Raise a Concern within the Academy Trust

- 5.1 As a first step, you should normally raise concerns with your immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should approach either the CEOs, the Head or Chair of Governors/Trustees in the first instance. If you have concerns regarding the CEOs you should contact the Chair of Trustees at Chair@uptoncourtgrammar.org.uk

Please say if you want to raise the matter in confidence so the person you contact can make appropriate arrangements.

- 5.2 Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate officer. It is important, however, that when the concern is raised, you make it clear that the issue is being raised under the Whistleblowing Policy.
- 5.3 The earlier you express the concern, the easier it is to take action. You may also wish to involve your Trade Union representative at this stage.
- 5.4 Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.
- 5.5 Advice and guidance on how matters of concern may be pursued can be obtained from the the HR lead.
- 5.6 You may also invite your trade union or professional association to raise a matter on your behalf.

6. How the Trust will respond

6.1 The action taken by the Trust will depend on the nature of the concern. The matters raised may:

- be investigated internally;
- be referred to the Police;
- be referred to the Education Funding Agency.

6.2 In order to protect individuals and the Trust, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection) will normally be referred for consideration under those procedures.

6.3 Some concerns may be resolved by agreed action without the need for investigation.

6.4 Within ten working days of a concern being received, the Academy will write to you:

- acknowledging that the concern has been received;
- indicating, in overall terms, how it proposes to deal with the matter;
- giving, where possible, an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made; and
- telling you whether further investigations will take place, and if not, why not.

6.5 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

6.6 When any meeting is arranged, you have the right, if you so wish, to be accompanied by a Trade Union colleague, a work colleague, a professional association representative or a friend who is not involved in the area of work to which the concern relates.

6.7 The Trust will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Trust will advise you about the procedure.

6.8 The Trust accepts that you need to be assured that the matter has been properly addressed and as such, where possible, the Trust will provide information in this regard.

7 Independent Advice

7.1 If you are unsure whether to use this Policy or you want independent advice at any stage, you may contact:

- if applicable, your union;
- the independent charity Public Concern at Work on 020 7404 6609. Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work.

8 How the matter can be taken further

- 8.1 This policy is intended to provide you with an avenue to raise concerns within the Trust and to give you the reassurance you need to raise such matters internally. The Trust hopes you will be satisfied. If you are not, and if you feel it is right to take the matter outside the Trust, you should contact a prescribed person or body (guidance is available from [GOV.UK - Blowing the whistle: list of prescribed people and bodies](#)). This includes a list of public bodies which can deal with particular areas of concern e.g. Education, Finance etc. You can also make a disclosure to a solicitor.

You should tell the prescribed person or body if they think that the Trust:

- will cover the issue up;
- treat you unfairly if you complained;
- hasn't sorted the issue out and you've already reported it.

In taking your concern outside the Trust, you should ensure that, as far as possible, the matter is raised without confidential information being divulged.

9 Oversight of Policy

- 9.1 The Trust will maintain a corporate register of the number and nature of the concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Board of Trustees.
- 9.2 The Policy will be reviewed on an annual basis to ensure the Policy remains up to date and to ensure it remains effective.

Appendix A

Allegations of Abuse against Staff

The following is to be read in conjunction with the Trust's staff disciplinary policy and with the Education Department's publication "Safeguarding Children and Safer Recruitment in Education".

Overview

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer, including a governor of the school, is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

This procedure is drawn up taking account of the following guidance:

- Working Together to Safeguard Children 2018;
- London Child Protection Procedures 2016;
- Keeping Children Safe in Education 2019

The Trust Board at Pioneer Educational Trust ensures that:

- The Trust has a child protection policy and procedures in place that are in accordance with local authority guidance and locally agreed interagency procedures, and the policy is made available to parents on request;
- The Trust operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- The Trust has procedures for dealing with allegations of abuse against members of staff and volunteers that comply with guidance from the local authority and locally agreed interagency procedures.
- The Trust have appointed an Associate Director of Safeguarding who will set the highest standards of safeguarding. They will ensure that we:
 - Create a culture of inclusion and tolerance;
 - Embed a cross Trust working party to monitor, evaluate and improve safeguarding practices;
 - Support DSLs and Deputy DSLs;
 - Develop and implement a comprehensive and strategic programme of staff training.
 - The Trust Board remedies without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention;
 - It is recognised that allegations may also arise for a member of staff outside of the context of work or home;
 - The Chair of the Trust is nominated to be responsible for liaising with the local authority and/or partner agencies, as appropriate in the event of allegations of abuse being made against the CEOs/Head;
 - The Trust Board reviews its policies and procedures annually and provides information to the local authority about them and about how its duties have been discharged.

Procedures

We recognise that any possibility that a member of staff may have hurt a student must be investigated thoroughly, but in a way that does not prejudice either the student or the member of staff. Any investigation of an allegation of abuse against a member of staff must follow the objective, professional standards and routines described here.

Initial allegation made to the school

Any allegation of abuse by a teacher on a student must be reported to the Head. Should the initial allegation first be made to any other member of staff then that member of staff must either request the person raising the allegation to report it to the Head or if that is not possible to pass details of the allegation to the Head immediately.

Should the allegation be made against the Head or the CEOs then this should be brought to the attention of the Chair of the Trust immediately email: chair@pioneereducationaltrust.org.uk

Should the allegation meet any of the following criteria then the CEOs or the Head should report the allegation to the local authority designated officer the same day that the allegation is received that:

A teacher or member of staff (including a volunteer) has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

Behaviours should be considered within the context of the four categories of abuse (i.e., physical, sexual and emotional abuse, and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see section 16-19 Sexual Offences Act 2003);
- 'Grooming' i.e., meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.);
- Possession of indecent photographs / pseudo-photographs of children.
- Please see Appendix B for further advice and guidance regarding abuse, wrongdoing or malpractice

If an allegation requires immediate attention, but is received outside normal office hours, the Head/CEOs should consult the local authority children's social care emergency duty team or local police and inform the designated officer (LADO) as soon as possible.

Initial Consideration

The CEOs/Head will discuss the matter with the local authority designated officer and provide any further details of the allegation and the circumstances in which it was made. The CEOs/Head should not investigate the allegation at this stage. The discussion will also consider whether there is evidence or information that establishes that the allegation is false or unfounded.

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind.

They should not:

- Investigate or ask leading questions if seeking clarification;
- Make assumptions or offer alternative explanations;
- Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

They should:

- Make a written record of the information (where possible in the child/adult's own words), including the time, date and place of incident(s), persons present and what was said;
- Sign and date the written record;
Where a child is involved in any way immediately report the matter to the Head

Initial action by the Head

When informed of a concern or allegation, the Head should not investigate the matter or interview the member of staff, child concerned or potential witnesses. They should:

- Obtain written details of the allegation / concern, signed and dated by the person receiving (not the child / adult making the allegation);
- Approve and date the written details;
- Record any information about times, dates and location of incident(s) and names of any potential witnesses;
- Record discussions about the child and/or member of staff concerned, any decisions made, and the reasons for those decisions.

If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the local authority designated officer (LADO) will immediately refer to children's social care and ask for a strategy discussion in accordance with Working Together to Safeguard Children to be convened straight away. In those circumstances the strategy discussion should include the local authority designated officer and the CEOs/Head.

If there is not cause to suspect that "significant harm" is an issue, but a criminal offence might have been committed, the local authority designated officer should immediately inform the police and convene a similar discussion to decide whether a police investigation is needed. That discussion will also involve the Trust and any other agencies involved with the child.

Action following initial consideration

Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the CEOs/Head to deal with it. In such cases, if the nature of the allegation does not require formal disciplinary action, the CEOs/Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Where further investigation is required to inform consideration of disciplinary action the CEOs/Head should discuss who will undertake that with the local authority designated officer. The discipline policy and procedures will be followed.

In any case in which children's social care has undertaken enquiries to determine whether the child or children are in need of protection, the CEOs/Head and Chair of Trust should take account of any relevant information obtained in the course of those enquiries when considering disciplinary action.

The local authority designated officer should continue to liaise with the Trust to monitor progress of the case and provide advice or support when required or requested.

Wherever possible, a strategy meeting/discussion should take the form of a meeting. However, on occasions, a telephone discussion may be justified. The following is a list of possible participants:

- The local authority designated officer (to chair if a strategy meeting);
- Relevant social worker and their manager;
- Police representative of the child abuse investigation team (CAIT);
- Designated safeguarding lead for the school;
- HR representative;
- Those responsible for regulation and inspection where applicable;
- Consultant paediatrician/health professional, if appropriate.

Depending on the circumstances of the case, the local authority designated officer will make the decision on who would be the appropriate professionals/agencies who should be in attendance.

The strategy meeting /discussion should:

- Decide whether there should be a s47 enquiry and/or police investigation and consider the implications;
- Consider whether any parallel disciplinary process can take place and agree protocols for sharing information;
- Consider the current allegation in the context of any previous allegations or concerns;
- Where appropriate, take account of any entitlement by staff to use reasonable force to control or restrain children (e.g. Section 93, Education and Inspections Act 2006 in respect of teachers and authorised staff);
- Consider whether a complex abuse investigation is applicable;
- Plan enquiries if needed, allocate tasks and set timescales;
- Decide what information can be shared, with whom and when.

The strategy meeting/discussion/initial evaluation should also:

- Ensure that arrangements are made to protect the child/ren involved and any other child/ren affected, including taking emergency action where needed;
- Consider what support should be provided to all children who may be affected;
- Consider what support should be provided to the member of staff and others who may be affected and how they will be kept up to date with the progress of the investigation;
- Ensure that the investigations are sufficiently independent;
- Make recommendations where appropriate regarding suspension, or alternatives to suspension;
- Identify a lead contact manager within each agency;

- Agree protocols for reviewing investigations and monitoring progress by the designated officer, having regard to the target timescales;
- Consider issues for the attention of the CEOs/Head and Trust governing body (e.g., media interest, resource implications);
- Consider reports for consideration of barring;
- A final strategy meeting, discussion, should be held to ensure that all tasks have been completed, including any referrals to DBS in appropriate, and, where appropriate, agree an action plan for future practice based on lessons learnt.

The strategy meeting, discussion, should take into account the following definitions when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient identifiable evidence to prove the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Malicious:** there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
- **Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances;
- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation; the term therefore does not imply guilt or innocence.

The designated officer (LADO) will advise the school whether or not informing the parent of the child involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, the school should inform the parent.

In some circumstances, however, the parent may need to be told straight away (e.g., if a child is injured and requires medical treatment).

Case subject to police investigation

If the police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a court, the police should wherever possible aim to pass all information they have which may be relevant to a disciplinary case to the CEOs/Head within three working days of the decision. In those circumstances the CEOs/Head and the local authority designated officer (LADO) should proceed as described above.

In any case in which children's social care has undertaken enquiries to determine whether the child or children are in need of protection, any information obtained in the course of those enquiries which is relevant to a disciplinary case should also be passed to the Trust and the CEOs/Head should request this information.

Sharing information with the accused

The school will seek advice from the LADO, the police and/or local authority children's social care about how much information should be disclosed to the accused member of staff. Subject to restrictions on the information that can be shared, the school will, as soon as possible, inform the accused member of staff about the nature of the allegation and how enquiries will be conducted.

The accused member of staff will be:

- Treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Advised to contact their trade union representative, if they have one, or a work colleague for support;
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- Given access to the school's employee assistance programme for support.

Suspension is a neutral act and it should not be an automatic response when an allegation is reported. Suspension should be considered in any case where:

- There is cause to suspect a child has suffered, or is likely to suffer significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal.

Based on assessment of risk, the following alternatives will be considered by the CEOs/Head before suspending:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted;
- Temporarily redeploying the member of staff to another role in a different location, for example to an alternative school within the Trust;
- Where it has been deemed appropriate to suspend, this should be confirmed in writing to the individual within one working day.

Suspension will be in line with the school's disciplinary policy and procedure if it is considered appropriate.

The school will appoint a named contact for the staff member during their period of suspension.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the school will consider how best to facilitate that. Most people would benefit from some help and support to return to work after what can be a very stressful experience. Depending on the individual's circumstances, a phased return and/or provision of a mentor to provide assistance and support in the short term may be appropriate. The school will also consider how the person's contact with the child or children who made the allegation can best be managed.

Confidentiality

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Section 13 of the Education Act 2011 introduces new restrictions implemented in September 2012 preventing the publication of any information that would identify a teacher who is the subject of an allegation of misconduct that would constitute a criminal offence, where the alleged victim of the offence is a registered pupil at the school. The reporting restrictions apply until the point that the accused person is charged with an offence or,

under the Secretary of State, publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

The legislation imposing restrictions makes clear that 'publication' of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. 'Publication' includes 'any speech, writing, relevant programme or other communication in whatever form which is addressed to the public at large or any section of the public'. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

Schools should take advice from the LADO, police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise.

Referral

If, on conclusion of the case, the Trust ceases to use the person's services, or the person ceases to provide his or her services, the Trust should consider a referral to Disclosure and Barring Service (DBS) and National College for Teaching and Leadership (NCTL). If a referral is appropriate the report should be made within one month.

Conclusions

Every effort should be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, even if:

- The individual refuses to co-operate, having been given a full opportunity to answer the allegation and make representations;
- It may not be possible to apply any disciplinary sanctions if the person's period of notice expires (where the staff member has resigned) before the process is complete.
The disciplinary process will continue even if the person resigns. An inquiry will be held rather than a hearing and an outcome recorded (e.g. if the employee had remained in employment they would have been summarily dismissed due to gross misconduct). This will then go on their file and be used in any future references. It will also inform the referral to NCTL and DBS. An inquiry is held in much the same way as a hearing. The employee can be asked to attend but cannot be required to do so as they are no longer an employee. They can also be asked to submit any mitigation in writing.

By the same token, so called 'settlement agreements', by which a person agrees to resign provided disciplinary action is not taken and that a future reference is agreed, **must not be used in these cases**.

In any event, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the DBS or to the NCTL where circumstances require that.

A settlement agreement which prevents the school from making a DBS referral where the criteria are met would likely result in a criminal offence being committed as the school would not be complying with its legal duty to make the referral.

References:

“Safeguarding Children and Safer Recruitment in Education” (April 2012)
London Child Protection Procedures 2017
Keeping Children Safe in Education 2019

Policy Monitoring and Evaluation

The Trust is aware of the need to monitor and evaluate this policy regularly to ensure that the systems are in place to allow all of our pupils to achieve their full potential in a safe environment with appropriate and relevant support

To ensure competent, accountable and empowered practice, the focus of planned governor visits is to collect identified evidence, which may be carried out through:

- Interviews with pupils;
- Discussions with staff;
- Observations of classroom practice where this is deemed appropriate and useful;
- Reviews of documentary evidence which will show the following:
 - The identification of our strengths and weaknesses;
 - The assurance that future actions are targeted to address any weaknesses;
 - The recognition of our successes and the assurance that best practice is embedded;
 - The cycle of school development planning;
 - The allocation of resources in the most efficient and effective way to maximise their use;
 - The assurance that there is consistency throughout the school/Trust;
 - The Identification of the needs of pupils, staff, parents and the wider community and the assurance that they are met.

Appendix B

ILLUSTRATIVE LIST OF MALPRACTICE, ABUSE OR WRONGDOING

1. Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. slander or libel).
2. Maladministration (e.g. unjustified delay, incompetence, neglect advice).
3. Breach of any statutory Code of Practice (e.g. National Code of Local Government Conduct).
4. Health and safety risks, including risks to the public as well as other employees (e.g. faulty electrical equipment).
5. Abuse of children and vulnerable adults (e.g. through physical, sexual, psychological or financial abuse, exploitation or neglect).
6. Damage to the environment (e.g. pollution).
7. The unauthorised use of public funds (e.g. expenditure for improper purpose).
8. Fraud and corruption (e.g. housing benefit fraud, to solicit or receive any gift/reward as a bribe).
9. Breach of the Member or Employee Code of Conduct.
10. Abuse of power (e.g. bullying/harassment).
11. Other unethical conduct.