



LIGHTHOUSE
SCHOOLS PARTNERSHIP

BUSINESS ETHICS POLICY

**Incorporating Register of Business and Pecuniary Interests,
Gifts and Hospitality, Anti Fraud and Whistleblowing
(Finance) Policy and Procedures
Statutory**

Policy Approved by the Board of Trustees

Signed:

A handwritten signature in black ink that reads "A Haysom".

Date: 1 July 2021

Name: Adele Haysom

Chair of Board of Trustees

Authorised for Issue

Signed:

A handwritten signature in blue ink that reads "Gary Lewis".

Date: 1 July 2021

Name: Gary Lewis

Chief Executive

Document History

Version	Author/Owner	Drafted	Comments
1.0	Clare Sanders	June 2016	Based on Gordano School model - original source not recorded
2.0	Clare Sanders	July 2017	Policy applies to - added LSP Central Team Approved by LSP Board of Trustees 11 July 2017
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This Policy applies to all schools and employees within the Lighthouse Schools Partnership.

BUSINESS ETHICS POLICY

Incorporating Register of Business and Pecuniary Interests, Gifts and Hospitality, Anti Fraud and Whistleblowing (Finance) Policy and Procedures Statutory

Introduction

It is important that Members, Trustees, Governors and members of staff act, and are also seen to act, impartially.

The Members and the Board of Trustees of the Lighthouse Schools Partnership (LSP) seek to run all aspects of the Trust's financial management and business activities with high standards of conduct and integrity.

The LSP is committed to tackling fraud and other forms of malpractice and treats these issues seriously. It is recognised that some concerns may be extremely sensitive.

In the event that Members, Trustees, Governors, members of staff, parents or the school community at large become aware of activities which give cause for concern, this Business Ethics policy is provided as a reference document to establish a framework within which issues can be raised confidentially. The process allows for concerns to be raised within the school environment, allows recourse to an external party outside the management structure of the school where this becomes appropriate and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

In May 1996 the Nolan Committee published a report on standards in public life as applicable to local public spending bodies. This policy is written to comply with the seven principles that should be applied to public life.

One important means by which the Trust can demonstrate that it is applying these principles is by maintaining a register of business and pecuniary interests.

The report also made a number of recommendations in relation to whistleblowing. The Nolan Committee used the term whistleblowing to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not "leaking" information but refers to matters of impropriety e.g. a breach of law, School procedures or ethics. Nor is whistleblowing the raising of a grievance within the Schools (which would be dealt with under the Staff grievance procedures). The term whistleblower denotes the person raising the concern or making the complaint.

Existing good practice within the LSP in terms of its systems of internal controls, both financial and non-financial, and the external regulatory environment in which the Trust and its schools operate, ensures that cases of suspected fraud or impropriety rarely occur.

This document is a public commitment that concerns are taken seriously and will be actioned.

Guiding Principles

The Academy Trust Handbook represents the context within which the Trust and the schools within it operate financially.

1. Business and Pecuniary (monetary) Interests

The Members, Trustees, Governors and members of staff have a responsibility to avoid any conflict between their business and personal interests and affairs and the interests of the LSP.

The schools within the LSP each maintain a register of business and pecuniary interests that lists for Governors and senior members of staff, any business interests that they, or any member of their immediate family have. The register, for senior staff and governors, is available on the school's website for inspection by any interested party such as staff, parents, auditors and the Education and Skills Funding Agency (ESFA).

The Trust also maintain a register of business and pecuniary interests that lists for Members, Trustees and members of staff in the Central Team, any business interests that they, or any member of their immediate family have. The register, for senior staff, Trustees and Members, is available on the Trust's website for inspection by any interested party such as staff, parents, auditors and the Education and Skills Funding Agency (ESFA).

The maintenance of the registers helps the LSP Members, Trustees, Governors and members of staff to meet requirements for withdrawal from meetings due to a conflict of personal interest as stated in the DfE's Governance Handbook, the Academy Trust Handbook and the Trust's Articles of Association.

The register must capture relevant business and pecuniary interests of Members, Trustees, Governors and senior employees including:

- Directorships, partnerships and employments with businesses
- Trusteeships and governorships at other educational institutions and charities

Senior members of staff include:

- All members of the Schools Leadership Team
- All members of the Schools Finance Team
- Any members of staff that have, or contribute towards, authority to spend such as budget holders

For each interest the following information must be recorded:

- The name of the business
- The nature of the business
- The nature of the interest
- The date the interest began

The disclosures must also include any relevant material interests from close family relationships. This is defined as a relative, a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but is not limited to, a child, stepchild, grandchild, parent, grandparent, brother, sister, spouse or anyone living with them as a partner.

Where a Member, Trustee, Governor or senior member of staff or a close family relation has any interest in a matter to be discussed at a Members', Trust Board or Local Governing Body meeting the Member, Trustee, Governor or member of staff must declare their interest and withdraw from that part of the meeting.

It is the responsibility of Members, Trustees, Governors and members of staff to ensure their declarations of business interests are kept up to date at all times, and to amend or update them as necessary.

All Members, Trustees and Governors meetings' agendas will contain a standing item for attendees to declare any changes to their declarations of interests.

At the beginning of each school academic year every Member, Trustee, Governor and senior member of staff will be required to complete a business interests form, provided as Appendix 1, and should ensure that it is updated throughout the year as and when any Business or Pecuniary interest may arise. Nil returns will also be required where a Member, Trustee, Governor or member of senior staff has no such interest.

Staff should also be aware, for their own and the Trust's protection (whoever is appropriate in the case in question) to ensure that they let others know of any circumstances that they believe others could think might affect their judgement.

The Trust, and each individual school, is required to record and publish a summary of business and pecuniary interests on their website. The format to be used for this purpose is provided in Appendix 2.

2. Gifts and Hospitality

Members, Trustees, Governors and members of staff should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers. Members of staff are required to inform their line manager of offers, as detailed below, of gifts and hospitality offered in connection with their links with the school or Trust as they arise, and whether the offer was accepted or declined. Members, Trustees and Governors should provide the same information to the Chief Executive Officer. The declaration form is provided as Appendix 3.

The acceptance of gifts and hospitality can potentially compromise Members, Trustees, Governors and members of staff. Great care should be taken in dealing with commercial organisations and the following guidance should be followed:-

Recommended limits Gifts, Hospitality, Entertainment or other services	Information on acceptance/referral/declaration
Occasional/one off - Below £50	Deemed acceptable Declaration not required
Occasional/one off - Between £50 and £250	Advisory Band - please refer to the Trust's Chief Financial and Operating Officer as to whether declaration of offer to be registered
Occasional/one off - Over £250	Declaration of offer to be registered whether accepted or declined
Regular - any value	Declaration of offer to be registered whether accepted or declined
Any gifts/favours that are sustained or Members, Trustees Governors/staff have concerns about that may compromise their integrity should be documented.	

The following examples of gifts and favours are considered acceptable if given on an occasional basis:

- A modest business dinner to discuss business,
- Attendance at trade fairs or similar events where there is a general invitation to customers,
- Attendance at cultural or sporting events sponsored by the company concerned,
- Attendance at a company anniversary celebration.

The following must never be offered or accepted (This list is not intended to be exhaustive):

- Monetary gifts,
- Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff,
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process,
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

The trust is required to publish Gifts and Hospitality. Schools and the Central Team must provide a summary of all declared Gifts and Hospitality by 30th September following the end of each financial year using the form provided as Appendix 4. This information will be reported to the Board of Trustees.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £20 per head should be used as a guideline.

Alcohol must not be purchased out of a school's/Trust budget.

The Chief Financial and Operating Officer must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

3. **Anti Fraud Policy and Procedures**

The Anti-Fraud arrangements are included in this policy to ensure that the Trust is protected, to the best of its ability, against fraudulent activity which could result in financial losses and reputational risks.

Aims

- To avoid any fraudulent activity from both internal and external parties.
- Protect the Trust's resources.
- To provide a clear reporting process to all stakeholders when fraud is suspected.
- To meet ESFA audit regulations.

How

- Staff training to identify how to avoid being subject to fraudulent activity.
- Robust financial control measures in place to reduce fraudulent risk.
- Clear protocols and processes followed when any fraud is suspected.
- Communication to the wider staff on the use and purpose of the policy.

The Lighthouse Schools Partnership (LSP) is committed to the prevention of fraud and the promotion of an anti-fraud culture.

The Trust operates a zero-tolerance attitude to fraud and requires all staff, Members, Trustees, Governors and volunteers to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.

The Trust will investigate all instances of actual, attempted or suspected fraud and will seek to recover any losses and pursue appropriate sanctions against the perpetrator(s). This may include criminal prosecution, disciplinary action, legal proceedings and professional sanctions.

This policy applies to Members, Trustees, Governors and all staff (full time, part time, temporary and casual), consultants, contractors and volunteers.

3.1 Definition of Fraud

The term 'fraud' is often used to describe complex financial offences such as false accounting. However, in its simplest form, fraud is lying. Some people will lie, or withhold information, or generally abuse their position to try to trick someone else into believing something that isn't true. Examples might include:

- Sending fake invoices for goods and services that were not ordered or received.
- Use of the Trust or school's credit card to make personal purchases.
- Intercepting a Trust or school cheque and amending the name of the payee and/or the amount.
- Submitting false claims for sickness or expenses.

Individuals caught committing fraud can be prosecuted under the [Fraud Act 2006](#) if they make a false representation, fail to disclose information or abuse their position.

3.2 Key Responsibilities

The Trust's Chief Financial and Operating Officer is responsible for:

- Developing, implementing and maintaining adequate systems of internal control that prevent and detect fraud.
- Ensuring the testing the system of internal control and seeking independent assurance when appropriate.
- Regularly reviewing the anti-fraud arrangements contained within this policy and compliance with it to ensure it remains effective and relevant to the needs of the Trust.
- Reporting compliance with the policy on at least an annual basis to the Board of Trustees.
- Reporting allegations of actual, attempted or suspected fraud to the Board of Trustees.
- Ensuring all allegations of fraud are investigated appropriately, in compliance with relevant policies, procedures and legislation and commencing disciplinary and/or legal action where appropriate.

The Board of Trustees is responsible for:

- Overseeing the financial performance of the Trust, including its assets, making sure the Trust's money is well spent and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.

Staff are responsible for:

- Familiarising themselves with the types of fraud that might affect the Trust.
- Ensuring they adhere to the agreed policies and procedures, thereby protecting the Trust's reputation and assets from fraud.
- Reporting allegations of actual, attempted or suspected fraud to the Chief Executive and/or the Chair of the Board of Trustees as appropriate.
- Assisting in the investigation of suspected fraud when requested to do so, for example by providing witness statements.

3.3 Reporting Suspicions

The Board of Trustees and staff are an important element of the Trust's stance on fraud and are required to raise any concerns that they may have. The Board of Trustees and Chief Executive Officer will deal with any financial irregularities robustly.

Staff should immediately report any concerns about actual, attempted or suspected fraud to the Trust's Chief Executive Officer. However, if the concerns relate to the Chief Executive Officer, staff should report their concerns to the Chair of the Board of Trustees.

Under no circumstances should staff investigate the matter themselves.

Should a Member, Trustee, Governor or member of staff wish to seek advice about how to deal with an allegation of fraud, or want to report the matter anonymously, they should contact the Trust's Legal representatives, Browne Jacobson.

The Public Interest Disclosure Act 1998 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity <https://protect-advice.org.uk/>.

A referral form has been provided at Appendix 5 to detail the information that should be captured when an allegation of fraud arises.

3.4 Fraud Response Plan

The Lighthouse Schools Partnership has established guidelines for senior staff and the Board of Trustees (Appendix 6) to use on the immediate actions to be taken in the event of a fraud being discovered or suspected. It covers how and when to seek professional advice, securing evidence and preventing further losses.

4. Whistleblowing Policy and Procedures (Trust and School financial and business activities)

The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance which should be dealt with under the Trust's grievance procedures.

The Trust aims to be an honest and ethical organisation and is opposed to any means of Fraud. All staff have a responsibility to protect the assets of the Trust. The Trust is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved and will reassure employees they will be protected from victimisation or reprisals if they raise any concerns.

4.1 When might the Whistleblowing policy apply?

The type of activity or behaviour which the Trust considers should be dealt with under this policy includes:

- manipulation of accounting records and finances
- inappropriate use of Trust/School assets or funds
- decision-making for personal gain
- any criminal activity
- Cyber crime and activity which compromises cyber security
- abuse of position
- fraud and deceit or corrupt practices
- serious breaches of Trust/School procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest)
- other unethical conduct.

Anonymous allegations will only be considered if the issues raised are:

- very serious
- the credibility of the allegation is considered to be high
- the likelihood of confirming the allegation is high.

This procedure is to ensure that staff have a mechanism with which to report suspected fraud. Where Members, Trustees, Governors or members of staff wish to report or complain about financial management or impropriety within the Trust, the leadership will then have the means to investigate by the use of the following procedures.

4.2 Procedure

Any employee that suspects fraud or impropriety has a duty to report their suspicions. The Trust encourages the whistleblower to raise the matter internally in the first instance to allow those Members, Trustees, Governors and members of staff in positions of responsibility and authority the opportunity to, if appropriate, give an explanation for the behaviour or activity.

All matters will be treated in strict confidence and anonymity will be respected wherever possible. All reports are to be documented thoroughly, written, dated and signed supporting evidence and statements should always be taken to any meetings if possible.

The Trust and each school within the Trust has designated members of the Senior Leadership Team (SLT) to deal with such matters (the Investigating Officer).

In the case where the concern is being raised about a Headteacher, the designated investigating officer is the Trust's Chief Executive Officer.

In the case where the concern is being raised about the Trust's Chief Executive Officer, the designated investigating officer is the Chair of the Trust Board.

The whistleblower may raise the matter in person, email or in written form, which should be addressed to one of the above named investigating officers. 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 Trust/School, the matter should be directed in the first instance to the Trust's Accountants or the Education and Skills Funding Agency, who will need to involve the appropriate Trustees.

The Education and Skills Funding Agency (ESFA) has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the whistleblower. The ESFA will ensure relevant officers of the legal or finance team are informed as appropriate and should advise the Trust Board of appropriate steps to take.

4.3 How will the matter be progressed?

The individual(s) in receipt of the information or allegation [the Investigating Officer(s)] will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can or should be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, members of the Trust's Central Team, the Trust's external advisors (legal, auditors), the police and the ESFA.

Records will be kept of work undertaken and actions taken throughout the investigation. The Investigating Officer(s), possibly in conjunction with the Chair of the Board of Trustees or

nominee, will consider how best to report the findings and what corrective action needs to be considered. This may include some form of disciplinary action and/or third party referral such as the police.

Depending on the nature of the concern or allegation, and whether or not the Investigating Officer considers there to be a case to answer, the disciplinary procedure may be applied. In such cases any disciplinary action will be considered by the statutory committee and, if appropriate, the appeals committee of the Trust Board. Where a case is proven on the balance of probability the matter will be reported to the full Trust Board, and where appropriate the ESFA.

If a fraud is strongly suspected, steps must be taken to mitigate the potential loss to the Trust/school arising from the fraud. For example, a finance officer should be assigned to different duties whilst the investigation is ongoing.

The Trustees should be advised when an investigation shows that fraud is likely, regardless of the size or monetary value involved in the fraud. They should also be advised as to the action recommended. It is the decision of the Board of Trustees if the fraud is to be reported to the police for prosecution.

All occurrences of fraud should be studied to determine whether sufficient procedures and controls exist to prevent fraud. Remedial actions should be put in place to prevent a reoccurrence.

If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, then the Trust's Grievance Procedure can be followed.

Professional onus is placed on the whistleblower to follow proper procedures. Any employee raising issues on a wider basis, e.g. with the press, without following the procedure in this policy may be liable to disciplinary action.

This policy will not apply for any concerns taken directly to the ESFA.

4.4 Respecting confidentiality

Wherever possible the Trust seeks to respect the confidentiality and anonymity of the whistleblower and will as far as possible protect him/her from reprisals. The Trust will not tolerate any attempt to harass or victimise the whistleblower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

4.5 Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

4.6 ESFA Requirements

The Academy Trust Handbook confirms trusts must notify ESFA of any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in an academy's financial year. Any unusual or systematic fraud (e.g regular occurrences of low value theft), regardless of value, must also be reported.



Lighthouse Schools Partnership - Register of Business and Pecuniary Interests, declaration of gifts & hospitality and acknowledgment of anti-fraud and whistleblowing information - For the year: 1 September xxxx to 31st August xxxx
Please complete and return to xxxx

It is a legal requirement that the Trust maintain a Register of Business and Pecuniary Interests. Each Member, Trustees, Governor and all senior staff are required to complete this form annually and ensure that it is updated if personal circumstances change.

Where there is nothing to declare a NIL declaration must be made by inserting “Nil Return” in boxes Business Interests and Pecuniary Interests. For further information please refer to the Lighthouse Schools Partnership [Business Ethics Policy](#)

For Trustees/Members and governors, conflicts of personal interests leading to withdrawal from meetings, further information may be found in the [DfE Governance Handbook October 2020](#)

TRUSTEE/MEMBER/GOVERNOR/MEMBER OF STAFF (please delete as applicable):			
Name:		Address:	
School:			
Please declare any business and pecuniary interests including directorships, partnerships, employment with businesses, trusteeships or governorships with other educational institutions and charities. This should include an relevant material interests from close family relationships			
Name of Business/ Pecuniary Interest	Type of Business	Nature of interest	Date interest began
<i>Example:- 123 Business Supplies</i>	<i>Example:- Stationery provider</i>	<i>Example:- Director</i>	<i>Example:- 1st June 2012</i>

Unique document no:
Document title Business Ethics Policy
Version 4.0

DECLARATION OF BUSINESS AND PECUNIARY INTERESTS

I certify that I have declared all beneficial interests which I or any person closely connected with me have with businesses or other organisations which may have dealings with the Trust and Schools within the Trust.

GIFTS AND HOSPITALITY

I confirm that I have read and understood the financial regulations (page 5, section 2) regarding my responsibility for recording all offers of gifts and hospitality offered in connection with my links with the Trust and Schools within the Trust.

ANTI-FRAUD and WHISTLEBLOWING (Trust financial and business activities) [LSP Whistleblowing Policy September 2019](#)

I have read and understood the procedures for reacting to specific situations with regards to whistle blowing.

I agree that the above information is correct. I undertake to provide additional information throughout the academic year should my circumstances change.

Signed:	Date:
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Appendix 3

**Lighthouse Schools Partnership - Personal Declaration of Gifts and Hospitality -
Financial Year Ending 31 August xxxx**

Name:	
School:	
Role - Member, Trustee, Governor or Member of Staff:	
Date of Gift:	
Estimated Value (£) of Gift/Hospitality:	
Nature of Gift / Hospitality:	
Is the Gift / Hospitality a one off or regular?	
Supplier of Gift / Hospitality:	
Gift/Hospitality Accepted/Declined:	
Reason for Acceptance/Non-Acceptance:	

Signed:	
Date:	
If in Advisory Band - Authorisation required from the Chief financial and Operating Officer	
Authorised by:	



Appendix 4

**Lighthouse Schools Partnership - Summary declaration of Gifts and Hospitality -
Financial Year Ending 31 August xxxx**

Please complete and return to the Central Team by 30th September following the end of the financial year in question

Date of Gift	Name of Member, Trustee, Governor or Member of Staff	Estimated Value (£)	Nature of Gift / Hospitality	One off or regular?	Supplier of Gift / Hospitality	Reason for Acceptance/ Non-Acceptance

The above gifts and hospitality, which may have an effect on the dealings of the Trust, have been declared during the financial year ending 31st August xxxx

School:	
Signed:	
Post:	Business Manager / Headteacher
Date:	



Appendix 5

Fraud Reporting Form

If you have any concerns about fraud please complete this form and address it to the Chief Executive Officer, The Lighthouse School Partnership, St Mary's Road, Portishead, Bristol BS20 7QR. If the concern raised relates to the Chief Executive, please address the form to the Chair of the Board of Trustees at the above address.

All the information provided will be treated in confidence.

Name of the person(s) or organisation you suspect:	
Address: (if known)	
Place of work / department / job title: (If known)	

Please provide details of your suspicions. You should include as much information as possible. For example, what was said in telephone or other conversations, dates, times and places, vehicles used, as well as the names of any other parties involved: (Continue on a separate page if necessary and attach any additional evidence you may have)

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Your details: (please leave blank if you wish to remain anonymous)

Name:	
Telephone number or contact address:	



Fraud Response Plan

It is important that allegations of actual, attempted and suspected fraud aren't ignored. Even seemingly insignificant concerns may later reveal a larger, previously unknown problem.

Securing Evidence

Ensure that any concerns are recorded fully. Whenever possible keep written notes that cover:

- Names, addresses and dates of birth.
- Descriptions (height, build, hair colour, ethnicity, clothing, distinctive features)
- Dates and times of key events.
- Vehicle registration numbers and descriptions.
- Details of any conversations had or overheard.
- Details of any actions or incidents that were observed.
- Telephone numbers.
- Company and/or business details.

Secure any physical evidence such as original invoices, receipts, letters, emails, cheques and application forms. Try to minimise how many people and how often evidence is handled. Fingerprint evidence can very quickly be destroyed.

If any of the evidence is on a computer, immediately unplug the computer from its power source. Don't attempt to shut the computer down through its operating system as this can alter or destroy key files and documents.

Whilst initially securing the evidence it is important not to be tempted to begin a more substantial investigation, or accuse individuals directly, without seeking professional advice (see 'Seeking Advice' below).

If an investigation is undertaken without following the appropriate policies, procedures and legislation, or if individuals are accused without sufficient evidence, it may lead to the perpetrators avoiding a disciplinary, criminal or civil sanction.

Preventing Further Losses

It is important to minimise any additional losses. For example, if the allegations concern the theft or loss of banking passwords, PIN's or similar credentials notify the bank, via the Central Team, immediately.

Equally, if the losses relate to a weak process, for example cash is routinely kept unsecured in a drawer, ensure that the process is changed, at least temporarily, until more permanent and improved processes can be implemented.

Seeking Advice

When an allegation of fraud is discovered it is important to seek professional advice as soon as possible. Advice can be sought from the Trust's Chief Financial and Operating Officer, Legal representatives, Browne Jacobson, and the Police. General advice about fraud is available from Action Fraud: <http://www.actionfraud.police.uk/>

Support for Witnesses

Members, Trustees, Governors, members of staff and the public may be feeling vulnerable before, during and after they have brought an allegation of fraud to the attention of the Trust.

Witnesses should be assured that they have acted appropriately by raising their concerns. They should be referred to the **Whistleblowing Policy and Procedures Section of the Business Ethics Policy** and reminded that the Trust does not tolerate reprisals, victimisation or harassment and will take all reasonable action to protect them.

In addition, the Trust will take steps to minimise any difficulties anyone may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Trust will advise or arrange for them to receive advice and support about the process being followed.