



Whistle blowing and professional challenge policy

This policy applies to all Aurora Academies Trust employees, including part time, temporary and contract employees. It also applies to employees of schools managed by Aurora.

PURPOSE:

Aurora Academies Trust is committed to high standards of ethical, moral and legal business conduct. In line with this commitment and Aurora's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and receive assurance that they will be protected from reprisals for whistleblowing in good faith.

POLICY:

The Professional Challenge policy is intended to cover serious concerns that could have a material impact on Aurora, such as actions that:

- ☐ May lead to incorrect financial reporting;
- ☐ Are unlawful;
- ☐ Are not in line with company policy, including the Code of Conduct; or
- ☐ Otherwise amount to serious improper conduct.

SAFEGUARDS:

Harassment or Victimisation

Harassment or victimisation of the complainant will not be tolerated.

Confidentiality

Every effort will be made to protect the complainant's identity consistent with the obligation to investigate complaints thoroughly and fairly.

Anonymous Allegations

We encourage employees to put their names to allegations because follow-up questions and other investigatory procedures may not be possible unless the source of the information is known. Nonetheless, concerns expressed anonymously will be investigated, with consideration given to:

- ☑ The seriousness of the issue raised;
- ☑ The credibility of the concern; and
- ☑ The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Malicious allegations may result in disciplinary action.

PROCEDURE:

Process For Raising a Concern

Reporting

The Professional Challenge procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be

reported directly to the Chief Executive Officer of AAT.

How a Complaint Will Be Handled

The action taken will depend on the nature of the concern. The Audit Committee of the AAT Board of Directors receives a report on each complaint and a follow-up report on actions taken.

Initial Inquiries

Initial inquiries will be made to determine what type of investigation may be appropriate and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

Report to Complainant

The complainant will be given the opportunity to receive follow-up on their concern in two weeks:

- ☐ Acknowledging that the concern was received;
- ☐ Indicating how the matter will be dealt with;
- ☐ Giving an estimate of the time that it will take for a final response;
- ☐ Telling them whether initial inquiries have been made;
- ☐ Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Information on Outcome

Subject to legal constraints the complainant will receive information about the outcome of any investigations. ***AAT reserves the right to modify or amend this policy at any time as it may deem necessary or necessary.***

(Reviewed: September 2023, next review September 2024)