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British School of Gran Canaria

Whistleblowing

Policy Document



THE BRITISH SCHOOL OF GRAN CANARIA

WHISTLEBLOWING POLICY

1. Scope

This policy applies to all school employees, contractors and volunteers within the school who wish to share a serious concern.

2. Definitions

Throughout this document the following words, terms and phrases have the following meanings:

BSGC – The British School of Gran Canaria.

The school – The British School of Gran Canaria.

Pupils – synonymous with students.

Head – the head teacher of the school.

Head of Sector – teaching staff responsible for assigned section of the school – South School (Primary), Tafira Primary, Secondary Senior Teachers.

Line-Manager – identified staff responsible for non-teaching areas of the school – Catering, Administration, Finance, Human Resources, ICT, and Maintenance.

Governors – elected officials to the school's Board of Governors that is ultimately responsible for the functioning of the school, financial stability and strategic development.

Chair of Governors – elected Governor responsible for the work of the Board of Governors.

3. Rationale

BSGC is committed to delivering a high quality education service to pupils and expect high standards from their staff, contractors and volunteers. In order to maintain these high standards a culture of openness and accountability is vitally important. With this in mind, this policy has three aims:

- to encourage staff to raise concerns about malpractice within the school without fear of reprisal;
- to reassure staff that concerns will be taken seriously;
- to provide information about how to raise a concern and the expected response.

4. Procedure

Whistle-blowing is the process where a concern is raised about malpractice, danger or illegality that the person raising the issue feels that is inappropriate or problematic to do this through the Concerns and Complaints Policy but believes that it is important to share their concern. The person 'blowing the

whistle' is not necessarily directly affected by the concern and may not have a personal interest in the outcome of any investigation.

The whistleblowing procedures enable employees to express a legitimate concern regarding suspected malpractice within the school, and possible failures in the school's safeguarding. Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

5. Confidentiality

~~Employees who raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate, to preserve confidentiality, that concerns are raised orally rather than in writing, although employees are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, the police will be informed and confidentiality cannot be guaranteed.~~

6. Reporting a Concern

Staff should raise their concerns with the Head, Head of Sector or Line-Manager. The earlier a concern is raised, the easier it will be to take action. As a whistle-blower, you are a witness to events, not the investigator. You do not need to wait for compelling evidence of malpractice before raising concerns but you must have reasonable grounds for your suspicion.

When reporting a concern you should provide as much information and detail as possible. In particular, you should provide the full names of the people involved or who know about the concern, as well as dates of events and any relevant documentation. This will help the investigator to focus on the main issues quickly.

There will be some cases where it is not appropriate for you to raise concerns with the Head, Head of Sector or Line-Manager, for example, where you know one of these post holders already knows about the malpractice or where you suspect they may be involved. In those cases, you should report your concerns to the Governors.

After a concern has been raised, the person receiving the report will contact the whistle-blower within three working days and agree on a course of action. This might include sharing the concern with other responsible staff, opening a formal investigation, applying other related school policies or reporting to an external authority. In all cases, the Head and relevant Head of Sector will be informed of the concern and course of action. The Head will record the matter on a central file. Issues related to the Head must be shared with the Chair of Governors, who will keep a record of all such concerns.

7. Confidentiality

The school understands that individuals may be reluctant to come forward with information about the wrong doing of a colleague or manager, or indeed at all. As such, the school recognises that whistle-blowers may wish to raise concerns in confidence. It may be appropriate, to preserve confidentiality, that concerns are raised orally rather than in writing, although employees are encouraged to express their concern in writing wherever possible. If the whistle-blower requests confidentiality then their identity will not be revealed without discussing the matter with them first, although matters of Safeguarding, Child Protection and other legally binding expectations, may require that information be passed onto external authorities or the police.

8. Anonymous Allegations

It is recognised that the purpose of the whistle-blowing policy is to allow people to make a disclosure with protection against reprisals or victimisation for disclosures that are made honestly and in good faith. It can be very difficult to come forward and make a disclosure and the prospect of having to identify yourself can make the action of whistle-blowing even more daunting. It is encouraged that the whistle-blower gives their name when raising concerns, as those expressed anonymously are much less powerful, more difficult to investigate and can lack credibility. The decision about whether to investigate an anonymous allegation will be made by the Head and/or the Chair of Governors. When making this decision they will take into account the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

9. Protection for the Whistle Blower

All concerns raised under this procedure will be treated seriously and a decision made about whether an investigation is appropriate. Depending upon the nature of the matter, it may be referred to the external authority or the police. The person to whom the concern was reported will be responsible for keeping the whistle-blower informed on progress of the investigation and the action taken, although they may not be told the outcome. In some cases, the investigation may result in criminal or disciplinary proceedings and, if this happens, the whistle-blower may be asked to provide a written statement or give evidence at a hearing. The Head and Governors will support them in this process.

10. Malicious Accusations

Accusations of malpractice are serious and will be treated as such by the school; it is therefore imperative that school personnel invoking whistleblowing procedures do so after careful consideration. Wilfully false, malicious, vexatious or frivolous accusations can be damaging and time consuming and can be considered as gross misconduct and may be treated as a disciplinary matter.

11. Reviews and Operation of this Policy

The Governors have overall responsibility for the operation of this policy and will review it periodically.

This policy is based on the following documentation *Whistleblowing for Employees – GOV.UK* and Ealing Schools Whistle Blowing Guidance – June 2015