



AISL
HARROW
SCHOOLS
哈罗学校

WHISTLEBLOWING POLICY (HS32)

APPLIES TO:	All staff
AISL RESPONSIBILITY:	Group Director of HR
LAST UPDATED:	1 st August 2022
REVISIONS: (Reviewer to enter initials and date)	AHU – 27 th July 2022

Educational Excellence *for* Life and Leadership

育以至善 • 卓以领航

1 PURPOSE OF THIS GUIDE

- 1.1 Each AISL school and its Governing Body are committed to honesty and integrity. There is an expectation that all staff maintain high standards of professionalism in accordance with their contractual obligations and the school's policies and procedures.
- 1.2 In the event that members of staff, parents, governors or the school community at large become aware of activities which give cause for concern, this policy acts as a framework to allow concerns to be raised confidentially. It also provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion. The school and governing body are 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.
- 1.3 This procedure should only be used where all other existing internal procedures are felt to be inappropriate or when a member of staff, for whatever reason, feels inhibited in going through normal line management channels. Staff should always first consider using normal line management for raising concerns.
- 1.4 This procedure is only for the purpose of raising concerns about wrongdoing and is not a substitute or alternative for existing procedures such as the *Internal Grievance Policy (HS36)* or *Staff Disciplinary & Competence Policy (HS40)* for staff. This policy does not form part of a staff member's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the school and the school reserves the right to amend its content at any time.

2 AIMS OF POLICY

- 2.1 This policy has three main aims:
 - a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - b) To provide staff with guidance as to how to raise those concerns;
 - c) To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be a mistaken.

3 WHO IS COVERED BY THIS POLICY

- 3.1 This policy reflects the school's current practices and applies to all individuals working at all levels of the organisation, including the Governors, Head, members of the Leadership Team, academic and administrative staff, consultants, contractors, and outside providers (collectively referred to as "staff" in this policy) who are advised to familiarise themselves with its content.



4 WHAT IS WHISTLEBLOWING?

- 4.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- criminal activity;
 - child protection and/or safeguarding concerns (see the specific Safeguarding policy);
 - miscarriages of justice;
 - danger to health and safety;
 - damage to the environment;
 - failure to comply with any legal or professional obligation or regulatory requirements;
 - financial fraud bribery or mismanagement;
 - abuse of position;
 - negligence;
 - breach of the school's internal policies and procedures including its Code of Conduct;
 - conduct likely to damage the School's reputation;
 - unauthorised disclosure of confidential information;
 - concerns about the harm or risk of harm to children;
 - the deliberate concealment of any of the above matters.
- 4.2 A 'whistle-blower' is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the school's activities (a whistleblowing concern) you should report it under this policy.
- 4.3 This policy should not be used for complaints relating to staff's own personal circumstances, such as the way you have been treated at work. In those cases the staff member should use the *Internal Grievance Policy (HS36)*. If you are uncertain whether something is within the scope of this policy, you should seek advice from the Head or from an appropriate Senior Manager. If the matter is in relation to an alleged wrongdoing by the Head, then you should seek the advice of the Chair of Governors.

5 SAFEGUARDS: PROTECTING YOUR RIGHTS

- 5.1 The School and the governing body recognise 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 school and the governing body will not tolerate harassment or victimisation and will take action to protect staff members when they have a genuine concern.

The following principles apply:

- Harassment or Victimisation.** The school and the governing body will not tolerate any attempt to victimise the 'whistle blower' or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances. Note that this does not mean that if a staff member is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted as a result of that staff member raising a concern under the whistleblowing policy.
- Confidentiality.** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. The school and the governing body will make every effort to protect a staff member's identity if confidentiality is requested. As indicated above,

identity will be protected as far as possible, but should the investigation into the concern require the staff member to be named as the source of the information, that this will be discussed with the staff member before their name is disclosed.

- c) **Anonymous Allegations.** Anonymous allegations will be considered at the discretion of the school and the governing body. In exercising the discretion, the factors to be taken into account would include:
- the seriousness of the issues raised;
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from attributable sources.

Staff members are encouraged to put their name to an allegation in cases where proper investigation may be more difficult or impossible if we cannot obtain further information and it is also more difficult to establish whether allegations are credible.

- d) **Untrue Allegations.** If a staff member makes an allegation where s/he has a genuine concern, but it is not confirmed by the investigation, no action will be taken against that staff member. If, however, we conclude that a staff member has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that staff member.
- e) **Unfounded Allegations.** Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the staff member who raised the concern, who will be informed that the school/governing body deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.
- f) **Support to Staff members.** It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate, to both the staff member(s) raising the concerns and any staff member(s) subject to investigation.

6 PROCEDURE: HOW TO RAISE A CONCERN

- 6.1 As a first step, a staff member should normally raise concerns with their immediate manager or their manager's superior. This depends, however, on the seriousness and sensitivity of the issues and who is involved.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the Heads. If the concern relates to the Head, then the employee should contact the Chair of the Board of Governors.

6.2 Investigation and Outcome

- a) Once a member of staff has raised a concern, an assigned member of senior staff or an appropriate member of the governing body will arrange a meeting as soon as possible to discuss their concern.
- b) A member of staff may bring a colleague or HR representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.
- c) The school and/or the governing body will carry out an initial assessment to determine the scope of any investigation. The school and/or governing body will inform the



- member of staff of the outcome of its assessment. The member of staff may be required to attend additional meetings in order to provide further information.
- d) In some cases, the school and/or governing body may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school and governing body to minimise the risk of future wrongdoing.
 - e) The school and the governing body will aim to keep the member of staff who raised the concern informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school and the governing body giving the member of staff specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation should be treated as confidential.
 - f) If the school or governing body concludes that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

7 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 7.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. The school and governing body aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 7.2 Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the Head immediately. If the matter is not remedied, they should raise it formally using the school's Complaints and Grievance Policy.
- 7.3 Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.