

THE BRITISH SCHOOL OF BAHRAIN



Whistleblowing Policy

DOCUMENT CONTROL	
Policy Reference	BSB - Whistleblowing - 027
Date Adopted	August 2019
Review Date	June 2020
Next Scheduled Revision (yearly)	June 2021



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BSB Whistleblowing Policy

1.0 Introduction

- 1.1 The British School of Bahrain (BSB) is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, students and visitors to share this commitment.
- 1.2 All outcomes generated by this document must take account of and contribute to safeguarding and promoting the welfare of children and young people at the School.
- 1.3 This policy enables members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriage of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct.
- 1.4 BSB is committed to the highest possible standards of openness and accountability. In line with that commitment, we encourage employees who have serious concerns about any aspect of the School's work to come forward and voice those concerns. BSB acknowledges that raising a concern about a colleague is challenging for staff but asks that staff remember that their colleague could be struggling to cope and alerting senior staff will enable us to put any necessary support and guidance in place.

2.0 Aims of the Policy:

- 2.1 The policy on whistleblowing is intended to demonstrate that BSB;
- 2.1.1 Has a culture of safety for raising concerns, valuing staff and of reflective practice.
 - 2.1.2 Will not tolerate malpractice.
 - 2.1.3 Respects the confidentiality of employees raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively.
 - 2.1.4 Will provide the opportunity to raise concerns outside of the standard line management structure where this is appropriate.
 - 2.1.5 Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations.
 - 2.1.6 Will provide a clear and straightforward procedure for raising concerns, which is accessible to all employees.

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3.0 Purpose of the BSB Whistleblowing Policy

- 3.1 All BSB employees may, in adequately carrying out their duties, have access to, or come into contact with, information of a confidential nature. Contractual terms and conditions provide that, except in the proper performance of duties, employees are forbidden from disclosing, or making use of, in any form whatsoever, such confidential information.
- 3.1.1 BSB does, however, adopt this policy on disclosing the public interest, i.e./ whistleblowing, to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation.
- 3.1.2 This procedure is separate from the School's adopted policies regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation. This procedure is to enable employees to express a legitimate concern regarding suspected malpractice within the School, and potential failures in the School's safeguarding regime, these concerns should be in the public's interest.
- 3.1.3 People working within organisations are often the first to realise that there may be something seriously wrong in the place in which they work. They may be wary of expressing concerns because they feel that to do so would be disloyal to their colleagues or to their School. They may also fear harassment or victimisation. In these circumstances, it may feel more comfortable to ignore the concern rather than report what may be a suspicion of malpractice.

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- 3.1.4 Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a severe risk to health, safety or the environment.
- 3.1.5 Employees who wish to 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. However, employees are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, the Police will be informed.
- 3.1.6 Victimisation or harassment of anyone using this policy or if anyone tries to discourage others from coming forward will be deemed to be a disciplinary matter.

4.0 How to Raise a Concern

- 4.1 Employees will be at liberty to express their concerns to their line manager. If this is not appropriate, then they should contact the Executive Head or Head of HR. Should the allegation be of a safeguarding nature, this concern should be raised directly with the Executive Headmaster, each School's Headteacher or the School's Designated Safeguarding Lead.
- 4.2 Concerns must be raised in writing. If the employee wishes to make a written report, the School recommends that they include in their letter, the background and history (giving relevant dates) and provide the reason why they are particularly concerned about the matter.
- 4.3 If the employee has a concern about any financial loss or irregularity you should raise this directly with the Director of Finance
- 4.4 This procedure is separate from BSB procedures regarding grievances; please see the BSB policies and guidance for advice on how to raise a grievance within practices. Employees should not use the whistleblowing procedure to raise grievances about their employment situation; instead, this procedure is to enable staff to express a legitimate concern regarding suspected malpractice within BSB.

5.0 How the School will handle the concern

- 5.1 Any concerns raised will be investigated thoroughly and promptly, and appropriate corrective action will be pursued. The employee making the allegation will be kept informed of progress wherever possible and, subject to third party rights, will be notified of the outcome.
- 5.2 An employee who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Executive Headmaster and Head of HR.

5.3 If urgent action is required, this may be taken before any investigation is conducted.

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6.0 Raising a Concern Externally

6.1 While the School hopes that this policy gives you the confidence to raise your concern with the School, we would prefer that you raised your concern with the proper external regulator rather than not at all.

6.1.1 It should be noted that there are circumstances where an employee may be entitled to raise a concern directly with an external body where the employee reasonably believes that;

6.1.2 It is justified by exceptionally serious circumstances.

6.1.3 The School would conceal or destroy the relevant evidence.

6.1.4 They would be victimised by the School.

6.1.5 Relevant statutory, regulatory or enforcing authorities have ordered it.

6.2 If the employee act in good faith and genuinely and reasonably believe that the malpractice falls within the remit of a regulator and that the information disclosed is substantially true, then an employee should contact a prescribed person or body.

7.0 Confidentiality

7.1 The School undertakes to protect an employees identity and will not disclose names where possible.

7.2 If there is evidence of criminal activity, then the Police will in all cases, be informed.

8.0 Untrue Allegations

8.1 False, malicious, vexatious or frivolous accusations will be treated as gross misconduct and dealt with under the Schools' Disciplinary and Competency Procedures.

8.2 If an employee makes an allegation in good faith, but the evidence produced during the investigation does not substantiate it, no action will be taken against them. If, however, an employee makes an allegation maliciously or for personal gain, this may result in disciplinary action being taken against them.

8.3 No employee will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the Whistle-blower procedures.