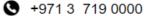


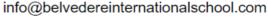
# **WHISTLEBLOWING POLICY**

2024 - 2025



























The aim of this policy is to provide an internal mechanism for staff to report any concerns.

#### **ABOUT THIS POLICY**

- 1.1 BIS is committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, officers, consultants, contractors, casual workers and agency workers who work directly for BIS.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### WHAT IS WHISTLEBLOWING?

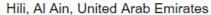
- Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, financial fraud or mismanagement, other criminal activity, miscarriages of justice, dangers to health and safety, damage to the environment, safeguarding concerns, any failure to comply with any legal or professional obligations or regulatory requirements, any other unlawful or unethical conduct in the workplace and the deliberate concealment of any of the preceding matters.
- 1.5 A whistleblower is a person who raises a genuine concern relating to any of the above and who believes they are acting in the best interest of the School. If you have any genuine concerns related to suspectedwrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy. This is known as making a Protected Disclosure.
- 1.6 Your disclosure is protected if the following rules apply:
  - you must disclose the information in good faith
  - you must believe it to be substantially true
  - you must nor seek any personal gain.





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- 1.7 This procedure should not be used where you have a complaint relating to your personal circumstances in the workplace. The grievance procedure contained in the Staff Handbook should be used in such cases.
- 1.8 Provided that this procedure is used appropriately and correctly, you will not suffer any detriment as a result of reporting a suspected wrongdoing. A failure toft to the this procedure may however make the disclosure unreasonable and the protection given to you by this procedure may be lost.
- 1.9 If you are uncertain whether something is within the scope of this policy you should seek advice from a Head Department, HR, or the Senior Leadership Team.

#### 2. SAFEGUARDING

- 2.1 Nothing within this policy is intended to prevent staff from complying with their statutory obligations.
  - Safeguarding/ child protection policy: You should raise any initial safeguarding concerns about a child with the School Social Worker in accordance with the child protection and safeguarding policy and procedures.
  - Safeguarding member of staff: You should raise any concerns about another staff member with the Head, or if the concern is about the Head, (without first notifying the Head) in accordance with the procedures in the child protection and safeguardingpolicy and procedures.
  - Whistleblowing policy: You should follow this procedure to raise concerns
    about poor or unsafe safeguarding practices or potential failures byschools,
    colleges or staff to properly safeguard the welfare of pupils if you are
    concerned that the child protection and safeguarding policy and procedures
    are not being followed correctly.
  - Referral: If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately. Anyone can make a referral.























#### 3. HOW TO RAISE A CONCERN?

This procedure applies to any of the concerns referred to in section 2 of this policy

## Stage one

- 3.1 We hope that in many cases you will be able to raise any concerns with your manager. In the event that your manager is involved in the suspected wrongdoing, you should proceed directly to stage two of this procedure.
- 3.2 You can expect a response detailing to whom the disclosure has been notified or any action taken within seven working days of your manager becoming aware of the disclosure.
- 3.3 If an investigation is necessary, the School will endeavour to complete this andreport back to the whistleblower within a further seven working days.

## Stage two

- 4.3 If no response is forthcoming within the timeframe (see 4.2), if you are not satisfied with the way in which your concern has been handled or if your manager is involved in the suspected wrongdoing you should notify the Head as appropriate.
- 4.4 You can expect a response detailing to whom the disclosure has been notified or any action taken within seven working days of the Head becoming aware of the disclosure.
- 4.5 If an investigation is necessary, the School will endeavour to complete this and report back to the whistleblower within a further seven working days.

























## Stage three

- 4.6 If no such response is forthcoming after seven working days from the Head, if you are not satisfied with the way in which your concern has been handled or if the Head is involved in the suspected wrongdoing you should inform the Chair of Astrum Advisory Board of the disclosure.
- 4.7 Wherever possible concerns raised under this policy should be set out in writing.

#### 4. **CONFIDENTIALITY**

4.1 The company will make every effort to maintain the confidentiality of any person raising concerns under this policy unless required by law to disclose it, . Staff should be aware that completely anonymous disclosures are difficult to investigate. The ability of the company to ask follow up questions or provide feedback will be limited if whistleblower cannot be contacted. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concernand following discussion with you.

#### 5. EXTERNAL DISCLOSURES

- 5.1 This policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find itnecessary to alert anyone externally.
- 5.2 We strongly encourage you to seek advice before reporting a concern to anyone external. In most cases you should not find it necessary to alert anyone external but before you do, as well as considering the internal help and support available which is identified above, please seek external advice from.
- 5.3 If you approach a commercial body or the media with details of the suspected wrongdoing or where your concern is disclosed in a malicious manner or for personal gain this may make the disclosure "unreasonable" and the protection given to you by this procedure may be lost. Additionally, we may consider this to be gross misconduct and disciplinary action may be taken against you.

























#### PROTECTION AND SUPPORT FOR WHISTLEBLOWERS 6.

- 6.1 We encourage openness and will support whistleblowers who raise genuineconcerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chair of Board immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 6.3 Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.
- However, if the School conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

| Review Date:      | August 2023 |
|-------------------|-------------|
| Next Review Date: | August 2024 |

| Principal              | Date: |  |
|------------------------|-------|--|
| BIS Board of Governors | Date: |  |



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