International School Rheintal

Whistleblowing Policy

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ISR Guiding Statements

International School Rheintal Vision

ISR is the school of choice in the Alpen Rheintal region providing a high quality international education in English for students from Kindergarten to Grade 12, inspiring international-mindedness, academic and personal excellence and responsible engagement.

Reviewed June 2023

International School Rheintal Mission

ISR is a supportive, challenging and student-centered environment. We encourage each student to reach their potential whilst promoting international-mindedness, empathy and life-long learning. Through teamwork and individual endeavours, members of the school community should:

- Respect and take responsibility for themselves, others and the environment
- Appreciate and respect diversity
- Think critically
- Reflect thoughtfully
- Communicate effectively
- Celebrate success

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Definition of whistleblowing

Whistleblowing can be defined as "the disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace, be it of the employee or his/her fellow employees" (Public Concern at Work Guidelines 1997).

Within the school setting, members of staff are often the first to realise that there is something seriously wrong; or to see the signs of conduct or practice which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice; or to perceive that things are not as they should be. However they may have reservations about expressing their concerns because they feel that speaking up would be disloyal to their colleagues, the leadership team or to the board or damaging to the reputation of the school itself. They may also fear victimisation or harassment. As a result, a member of staff could decide to ignore the concern rather than report it.

Purpose of this policy

The purpose of this policy is

- to give confidence to members of staff about raising concerns about conduct or practice which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice or is inconsistent with school standards and policies so that s/he is encouraged to act on those concerns
- provide members of staff with avenues to raise concerns
- ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken
- offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith.

What this policy covers

This policy covers whistleblowing relating to alleged:

- unlawful conduct
- miscarriages of justice in the conduct of statutory or other processes
- failure to comply with a statutory or legal obligation
- potential maladministration, misconduct or malpractice
- health and safety issues including risks to the public as well as risks to pupils and members of staff
- action that has caused or is likely to cause danger to the environment

- abuse of authority
- unauthorised use of public or other funds
- fraud or corruption
- breaches of financial regulations or policies
- mistreatment of any person
- action that has caused or is likely to cause physical danger to any person or risk serious damage to school property
- sexual harassment, i.e. any unwelcome conduct of a sexual nature that, whether through a single sufficiently severe instance or through repetition, has the purpose or effect of violating a person's dignity or creating a hostile, intimidating, or humiliating environment
- unfair discrimination or favouritism
- racist incidents or acts, or racial harassment, and
- any attempt to prevent disclosure of any of the issues listed.

Safeguard against reprisal, harassment and victimisation

ISR will not tolerate harassment or victimisation of members of staff when matters are raised in accordance with this whistleblowing policy. Any member of staff who victimises or harasses a member of staff as a result of their having raised a concern in accordance with the whistleblowing policy will be dealt with according to school procedures.

Confidentiality

ISR recognises that members of staff may want to raise concerns in confidence and will do its utmost to protect the identity of members of staff who raise a concern and do not want their name disclosed. However investigation into the concern could reveal the source of the information; and statements may be required from the member of staff as part of the evidence, which would be seen by all parties involved, particularly if the investigation leads to prosecution and the whistleblower is likely to be called in to give evidence in court.

Personal data is processed in accordance with the relevant laws of Switzerland, and while accused persons hold statutory rights to information, ISR may apply legally permitted exemptions to redact details that would compromise an ongoing investigation or reveal a confidential whistleblower's identity.

Anonymous allegations

The school encourages members of staff to put their name to allegations whenever possible, as anonymous concerns can be more challenging to follow-up on.

Nonetheless anonymous allegations should be considered under the whistleblowing procedure especially concerns raised relating to the welfare of children. In determining whether to take an anonymous allegation forward, ISR will take the following factors into account:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources and obtaining information from them.

An anonymous allegation can be made via the SpeakUp system, as outlined later in this policy.

Untrue and malicious/vexatious allegations

If an allegation is made in good faith but it is not confirmed by further inquiry, the matter should be closed and no further action taken. If, however, the inquiry shows that the allegation was malicious and/or vexatious or made for personal gain, then ISR would consider taking disciplinary action against the member of staff who made it.

Allegations concerning child protection issues

If the concern raised relates to a child protection issue the Designated Safeguarding Lead (DSL) should be consulted immediately who will decide whether a referral to the statutory authorities should be made so that the action for the handling of such allegations can be initiated. If the DSL is not available, the Deputy DSL should be informed. If an allegation concerns both the DSL and Deputy DSL, the chair of board should be informed.

Publicising ISR's whistleblowing policy

ISR takes appropriate steps to make all school staff, including casual or temporary school staff and individuals undertaking work experience in the school, aware of the whistleblowing policy via the school's website, namely the section in which all school policies are accessible.

Procedure for making a whistleblowing allegation

This is an overview of how to report a whistleblowing concern:

Non-anonymous
In cases where the whistleblower believes that they do not require anonymity, the concern may be raised either in writing or orally. Please note that a written submission is strongly preferred for the avoidance of doubt. Orally in this sense means speaking in person to either the Head of Support Services (Head of HR), Head of Senior School (DSL) or Head of Primary School; OR The Director of the School (Deputy DSL) in cases where one of the above is involved or perceived to be involved; OR Chair of Board in cases where the Director is involved or perceived to be involved, making clear at the beginning of the conversation that your matter is a whistleblowing concern. It may be required that a written statement is submitted. If reporting in writing, use the SpeakUp system. The reporter should set out the background and history of the concern; giving names, dates and places where possible, and explaining the reason for the concerns. Whether a case is raised orally or in writing, the process followed is defined in the next section.

Anonymous
In cases where the whistleblower wishes to be anonymous, the matter should be raised in writing via SpeakUp. The reporter should set out the background and history of the concern; giving names, dates and places where possible, and explaining the reason for the concerns. The concern is then dealt with according to this policy.

How a whistleblowing case is processed

Case Management Setup: Whistleblowing Committee

All incoming whistleblowing disclosures are evaluated jointly by a 3-person committee. This is normally made up of:

- **Head of Support Services (Head of HR)**
- **Head of Primary School**
- **Head of Senior School (DSL)**

If one of these people is involved or perceived to be involved, the responses are defined below. Every decision related to the process through the whistleblowing policy requires a unanimous decision by the committee. Where this is not possible, the case is escalated according to the table below.

Step-by-Step Handling Process

Step 1: Receipt & Conflict Assessment

- If a case is raised via SpeakUp in writing, the disclosure is automatically received by these three role holders. The committee meets within 3 school business days.
- If a case is reported orally, the recipient is responsible to call together the committee within 3 school business days.
- In all cases where a committee is formed, the director is informed prior to the first meeting.
- In cases involving (or perceiving to involve) Head of Support Services, Head of Primary School, Head of Senior School or Director, the Chair of Board is informed prior to the first meeting.
- Before opening the case file, each member confirms they have no direct personal connection or conflict of interest regarding the disclosure.
- If a conflict exists, or may be seen to exist, follow the table below:

Processing & Recusal Matrix

Scenario	**Committee Members Active**	**Escalation or Alternate Path if required and Reporting paths**
Standard Report (General employee / system disclosure)	**Full Committee:** Head of Support Services, Head of Primary School, Head of Senior School	Director (for final authorisation, deadlock resolution) Final report / decisions / referrals to Director, who informs the Chair of the Board
Report Involving (or perceived to involve) Head of Primary School	Head of Support Services + Head of Senior School *(Head of Primary School recused)*	Director added as 3rd member Final report / decisions / referrals to Chair of the Board

Report Involving (or perceived to involve) Head of Senior School	Head of Support Services + Head of Primary School *(Head of Senior School recused)*	Director added as 3rd member Final report / decisions / referrals to Chair of the Board
Report Involving (or perceived to involve) Head of Support Services	Head of Primary School, Head of Senior School *(Head of Support Services recused)*	Director added as 3rd member Final report / decisions / referrals to Chair of the Board
Report Involving (or perceived to involve) Director	**Full Committee:** Head of Support Services, Head of Primary School, Head of Senior School	Board Chair informed and determines their further involvement with the committee Final report / decisions / referrals to the whole board
2 members involved or perceived to be involved	Remaining committee member	Director and Board Chair added Final report / decisions / referrals to the whole board
3 members involved or perceived to be involved	Committee is required to recuse itself and hand the issue without delay to the alternate path	Director and Board Chair take over leadership Final report / decisions / referrals to the whole board
3 members and director involved or perceived to be involved	Committee is required to recuse itself and hand the issue without delay to the alternate path	Direct escalation to Board Chair Final report / decisions / referrals to the whole board

Step 2: Initial assessment (Within 5 School Business Days)

- The Committee reviews the report together and must agree unanimously on the classification:
    1. **Formal Whistleblowing:** Proceed directly according to this policy.
    2. **Standard HR / Operational / Personal Grievance:** Re-route to standard HR channels, informing the submitter where this is made possible by the method of submission
    3. **Information Needed:** Send a joint query back to the submitter through SpeakUp

Step 3: Managing Deadlocks

- If the 3-member panel cannot reach consensus on whether an investigation is warranted, the matter is automatically escalated to the Director (or the Chair of the Board if the Director is involved or perceived to be involved) to make the final determination on how to proceed.

Step 4: Investigation

- The Committee moves forward according to the provisions of this policy.
- The designated committee will review the allegation, gather evidence, and interview witnesses as necessary.
- The designated committee will maintain confidentiality wherever possible but will be mindful that there is no guarantee that the whistleblower can remain anonymous.
- To protect integrity, no individual committee member may conduct an investigation single-handedly

Step 5: Outcome

- Upon receiving the investigator's findings, the Committee jointly reviews the report and presents their unanimous recommendation to the party defined in the table above for final operational authorisation and action. The recommendation may include referrals, for example in the following cases:
    - Financial Misconduct: Re-routed to the designated parties responsible for financial management and propriety at ISR.
    - Criminal Activity: Referred to the Police.
    - Child Safeguarding: Referred immediately to the DSL / Deputy DSL and the competent Child and Adult Protection Authority.
- If a matter requires Police or statutory authority involvement, the internal whistleblowing investigation will be halted until statutory authorities conclude their

proceedings and confirm it is appropriate to resume

Step 6: Closing the Case

- The target is to complete the inquiry within 20 school business days from the date of the initial written submission. If the inquiry extends beyond the timescales outlined for specific reasons, all individuals concerned will be notified of this in writing with an indication when the inquiry will be completed.
- Summary feedback is sent back to the submitter where possible within 20 school business days of the original submission, in compliance with data privacy regulations. Such a response may include:
    - acknowledging that the concern has been received
    - indicating how it is proposed to deal with the matter
    - giving an estimate of the relevant timelines
    - advising whether any inquiries have been made
    - advising whether further inquiries will take place
    - informing the reporting party of support

Advice

Advice - do

- Make an immediate note of your concerns.
- Note all relevant details such as what was said in telephone or other conversations, the date, time and the names of any parties involved; or any action observed.
- Convey your suspicions to someone with the appropriate authority and experience as defined by this policy.
- Deal with the matter promptly.
- Keep a copy of all notes/details etc.

Advice - do not

- Do nothing.
- Be afraid of raising your concerns. You must not suffer any recrimination as a result of voicing a reasonably held suspicion. Any matter you raise will be handled sensitively and confidentially wherever possible.
- Approach or accuse any individuals directly.
- Try to investigate the matter yourself. There are rules surrounding the gathering of evidence for use in criminal cases and in relation to child protection cases. Any attempt to gather evidence by people who are unfamiliar with these rules may harm the case.

- Convey your suspicions to anyone other than those with the proper authority.
- Do not make public or media disclosures. Direct external reporting is strictly restricted to official statutory or regulatory authorities (such as law enforcement or the Child and Adult Protection Authority), and should only occur if there is an imminent threat to health or safety or an immediate and reasonable fear of evidence destruction or reprisal.
- If you wish to remain anonymous, do not include your name/position or any other information which could lead to your identity being disclosed.

Sources used

- Procedures for Whistleblowing in Schools and Model Policy, December 2007, Guidance Circular No: 036/2007, Welsh Assembly Government, Department for Children, Education, Lifelong Learning and Skills.
- Whistleblowing Policy, July 2021, Geneva English School.

NB - Last policy review led in 2026 by Owen Murphy, Director