

International School Rheintal

Whistleblowing Policy

Reviewed April 2022

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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 behaviour that is characterised by the making of unwelcome and inappropriate sexual remarks or physical advances
- sexual, physical or emotional abuse of members of staff or pupils
- 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 under this policy's 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.

Anonymous allegations

The school encourages members of staff to put their name to allegations whenever possible, as anonymous concerns are much less powerful.

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 by submitting a written or printed statement covered in an envelope which is then placed into the DSL's pigeonhole in school or otherwise mailed by postal service to either of the following:

- The DSL
- The Director of the School (Deputy DSL)
- Chair of Board (Heiner Graf, Graf Inno Consult, Churerstrasse 99, Postfach 315, CH-9471 Buchs SG).

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 should 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 needs to be informed at once.

Publicising ISR's whistleblowing policy

ISR should take 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

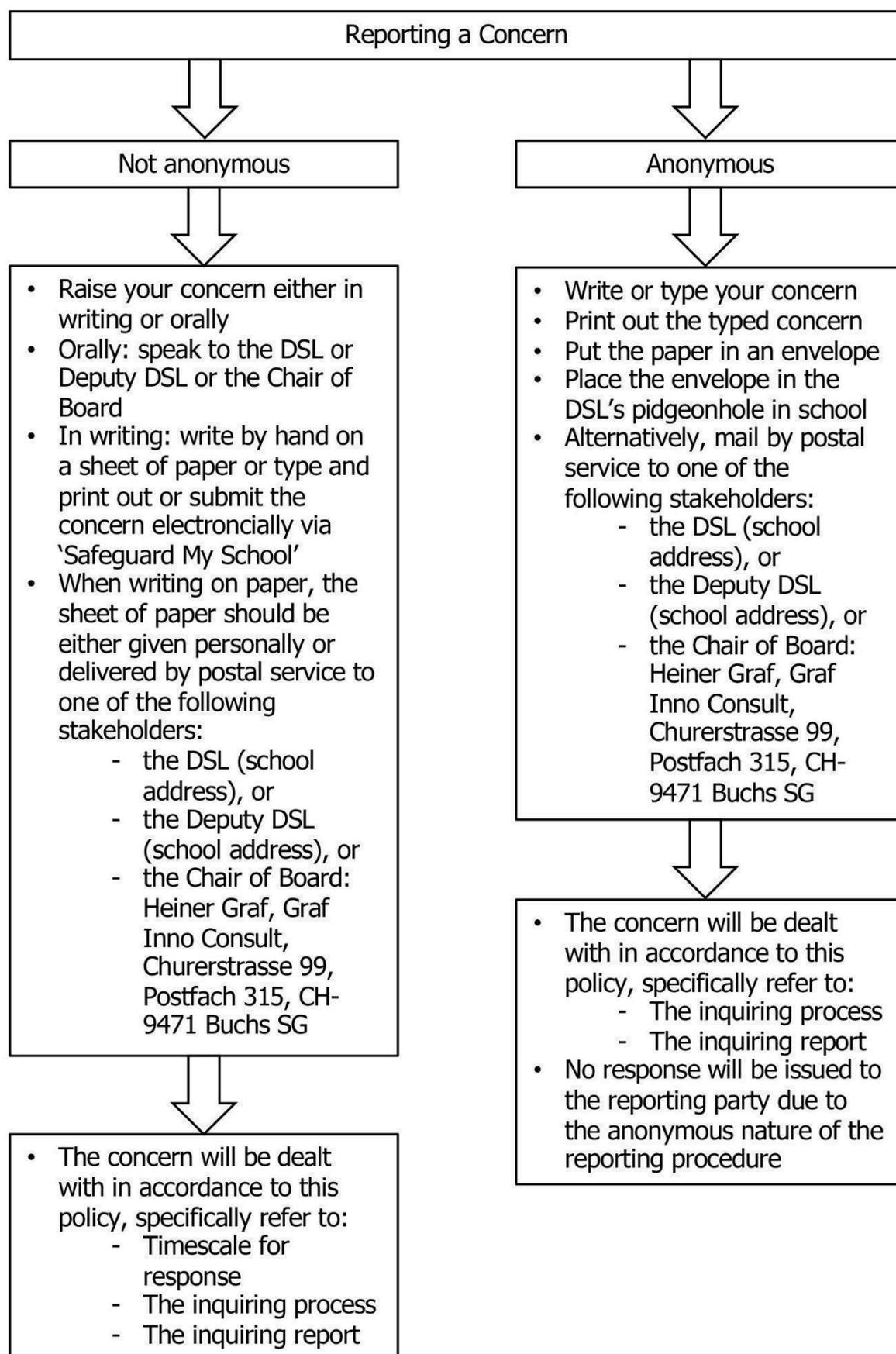
You should raise your concern with the Director or DSL only and, if the allegations involve these staff, the concern should be raised with the ISR Chair of the Board. The person to be approached depends to an extent on the seriousness and sensitivity of the issue and who is thought to be involved.

If the concern needs to have Police or other statutory authority involvement, the whistleblowing process will be halted until the statutory authorities have completed their investigations and confirmed that it is appropriate to continue with the whistleblowing process.

If possible put your concern in writing for the avoidance of doubt. You should set out the background and history of the concern; giving names, dates and places where possible, and explaining the reason for your concerns. If you feel unable to put the matter in writing you can still raise your concern verbally and should arrange to meet the appropriate person.

If an anonymous allegation is to be made, please follow the procedure in the section 'Anonymous allegations'.

The flowchart below offers an overview of how to report a concern.



Response to whistleblowing

The matter raised may:

- need inquiry internally in ISR
- need to be passed to the Police if it relates to alleged criminal activity
- need to be passed to the person who deals with complaints about financial management or financial propriety in ISR
- need to be referred to the DSL, Deputy DSL and local authorities on child protection, if there is a concern relating to child protection.

Timescale for response

The Director, DSL, Deputy DSL or Chair of the Board will look into whistleblowing allegations and normally provide a written response to the reporting party within 5 working days (except in the case of anonymous allegations):

- acknowledging that the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to provide a final response
- advising whether any enquiries have been made
- advising whether further enquiries will take place
- informing the reporting party of support available whilst matters are looked into, and
- maintaining confidentiality wherever possible, but also explaining that it may not be possible that the reporting party can remain anonymous.

The inquiry process

The Director, DSL, Deputy DSL or Chair of the Board will:

- Look into the allegation - seeking evidence and interviewing witnesses as necessary.
- Maintain confidentiality wherever possible but will be mindful that there is no guarantee that the whistleblower can remain anonymous.
- If appropriate, bring the matter to the attention of the person dealing with complaints about financial management.
- If appropriate, for concerns of criminal behaviour refer the matter to the Police.
- If appropriate, for concerns of child protection, refer the matter to the local authority/social services designated for child protection.
- The whistleblowing process will be halted until the statutory authorities have completed their investigations and confirmed that it is appropriate to continue with the whistleblowing process.

The target is to complete the inquiry within 10-15 working days from the date of the initial written response. If the enquiry 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.

The Inquiry Report

Following completion of the inquiry process the Director, DSL or Deputy DSL will make a written report and submit it to the Chair of the Board normally within 5 working days. Should the allegations involve the DSL/Director, the Chair of the Board will lead the inquiry and write the report. In this situation the Chair of the Board would submit the report to the Board members directly. The report will not contain the whistleblower's name unless you have expressly stated that you wish to be named. Following receipt of the inquiry report, the Chair of the Board will convene a committee with at least one other board member and the Director to consider the inquiry report and decide on the action to be taken. This should normally take place within 5 - 10 working days following receipt of the inquiry report.

Following notification of the committee's decision, the chair of governors will notify you of the outcome normally within 5 working days (except in relation to anonymous allegations), setting out the action to be taken or that no further action is to be taken and the reasons why.

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 e.g. the DSL, the director or the chair of governors.
- 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. The director and/or chair of board will treat any matter you raise 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 destroy the case.
- Convey your suspicions to anyone other than those with the proper authority.
- If you wish to remain anonymous, do not include your name/position or any other information which could lead to your identity being disclosed.

Source 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.