# British Overseas School: Whistleblowing Policy



# 1. Purpose

The British Overseas School is committed to the highest standards of integrity, probity, and accountability. We expect all members of our community to act responsibly, to safeguard pupils, and to uphold trust in the school. This policy exists to encourage concerns to be raised at an early stage, without fear of reprisal, and to ensure that such concerns are addressed promptly and fairly.

# 2. Scope

This policy applies to:

- All employees (academic and non-academic)
- Volunteers and contractors
- Supply and temporary staff
- Governors
- Any other person working on behalf of the school

It covers concerns raised in the public interest. It is not designed to replace existing procedures such as grievance, complaints, safeguarding, or disciplinary processes.

This policy is not designed for parents, who have their own routes by which to raise concerns or to make complaints.

# 3. Definition of Whistleblowing

Whistleblowing refers to the disclosure by an individual of wrongdoing or malpractice within the school. This may include (but is not limited to):

- Criminal activity
- Breaches of legal obligations or regulatory standards
- Safeguarding failures or risks to pupils' welfare
- Financial mismanagement, fraud, or corruption

- Health and safety risks
- Deliberate concealment of wrongdoing
- Misuse of school property or resources
- Serious professional misconduct

Concerns about personal employment conditions should normally be raised through the school's grievance procedure.

# 4. Principles

Those who raise concerns in good faith should:

- Be taken seriously
- Be protected from detriment
- Receive a timely response
- Know how their concern has been handled, within the limits of confidentiality

We encourage openness, honesty, and reflective practice, recognising that silence can place pupils and colleagues at risk.

### 5. Raising a Concern

Concerns should ideally be raised in writing. The report should state clearly:

- The nature of the concern
- Why it is believed to be true
- Any evidence available

Concerns may be raised with:

- The Head of School
- Principal (if the concern relates to a Head of School)
- The Chair of Governors (if the concern relates to the Principal)

In matters relating to safeguarding, the Designated Safeguarding Lead should be informed immediately. Where life, health, or security are at risk, urgent notification is required.

If the individual feels unable to raise the concern internally, they may approach an appropriate external authority. Guidance on this appears later in this document.

# 6. Confidentiality

The school will protect the identity of the person raising the concern, unless disclosure is required by law or necessary for a fair investigation. Anonymous disclosures are permitted but may limit our ability to investigate.

Information relating to any concern will be shared only with those who need to know.

# 7. Investigation

Upon receiving a disclosure:

- The concern will be acknowledged promptly.
- A named person will be appointed to investigate.
- Evidence will be gathered impartially.
- Relevant policies (for example, safeguarding or behaviour) may be applied.

Investigations will be proportionate and completed without unnecessary delay. Outcomes may include disciplinary action, policy changes, training requirements, referral to authorities, or formal reporting.

The whistleblower will be informed, as far as confidentiality allows, of the general outcome.

#### 8. Protection against Detriment

No whistleblower acting in good faith will suffer:

- Harassment
- Victimisation
- Damage to career prospects

Any attempt to penalise or intimidate a whistleblower will be treated as misconduct.

If it becomes clear that an allegation was knowingly false, disciplinary action may follow.

# 9. Malicious Allegations

Where a concern is raised without foundation and where malice can be demonstrated, this will be treated as a serious matter. Genuine mistakes made in good faith will not be penalised.

# 10. External Reporting

If internal procedures are exhausted or impracticable, individuals may report concerns to:

- Relevant UK foreign regulators (for example, the Department for Education's BSO team)
- Local authorities where required by law
- Statutory safeguarding bodies

Before doing so, the individual should consider the impact on pupils, colleagues, and the school, and ensure that disclosure is lawful.

# 11. Governance Oversight

The governing body will be informed, in summary form:

- Of whistleblowing concerns raised
- Of outcomes and remedial actions
- Of any developing patterns

Names may be withheld to preserve confidentiality.

#### 12. Training and Awareness

- Staff will receive periodic reminders of this policy.
- New staff will receive guidance during induction.
- Leaders will cultivate a culture of professional courage and responsibility.

#### 13. Record-Keeping

A secure record will be maintained of:

- Concerns raised
- Investigative steps
- Decisions made
- Actions taken

Records will be retained in accordance with school data-protection requirements.

# 14. Review of Policy

This policy will be reviewed annually by the governing body, or sooner if required by changes in law, regulation, or best practice.