

ICS Ltd WHISTLEBLOWING POLICY

Policy area: 6 – Professional
Date last revised: May 2019

Date established: February 2013
Date of next revision: May 2020

This policy will be reviewed in full by the Advisory Board and the Head of School, on an annual basis, or more frequently if there are changes in policy. This policy was last reviewed and agreed by the Advisory Board and the Head of School on 15/05/19. It is due for review in May 2020.

Signed

Daniel Jones
Chair of Advisory Board
Date: 15/05/19

Rose Threlfall
Head of School
Date: 15/05/19

Overview

Policy statement

Whistleblowing is the term used for an employee raising concerns about practices and procedures in their workplace. A key principle underlying this policy is that ICS Ltd, International Community Schools Ltd (“ICS”) aims to foster a culture of safety where employees feel empowered to raise concerns within the workplace without fear of retribution.

Every organisation – be it a business or public body – may face the risk of misconduct in their workplace. When this happens, usually the first people to realise or suspect will be those who work in or with the organisation.

This policy outlines the steps to be taken if this situation arises at ICS.

Concerns about the welfare of a child or safeguarding issue about a member of staff must be reported under the School’s Safeguarding including Child Protection policy.

Purpose/Rationale

ICS believes strongly that the best way to deal with a problem or a concern is to talk about it. Colleagues are encouraged to seek counsel from each other, or their direct line manager. In addition, concerns should be recorded, in writing.

This policy helps ICS staff to know the difference between making a complaint and whistleblowing, and how to raise their concerns.

Applicability

This policy applies to all ICS staff, agency workers, self-employed contractors, interns/trainees and volunteers.

Department for Education Guidance

The following guidance was used to inform this policy:

**Working Together to Safeguard Children (July 2018);
Keeping Children Safe in Education (September 2018).**

Access

This policy is available on request from the school offices. We also inform parents and guardians about this policy when their children join ICS, through our newsletters and our websites.

The policy is provided to all staff (including agency workers, self-employed contractors, temporary staff, interns/trainees and volunteers) at induction alongside our **ICS Code of Professional Conduct**.

Whistleblowing policy

1 What is the difference between making a complaint and blowing the whistle?

- 1.1 When someone blows the whistle they are raising a concern about danger or illegality that affects others (e.g. customers, members of the public, or their employer).
- 1.2 The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern - they are simply trying to alert others.
- 1.3 This is very different from a complaint. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint and, for this reason, is expected to be able to prove their case.
- 1.4 For these reasons, it is not in anyone's interests if an organisation's whistleblowing policy is used to pursue a personal grievance. ICS has a grievance or complaints procedure and this will be more appropriate for making a complaint.

2 Confidentiality

- 2.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

3 Anonymous allegations

- 3.1 This policy encourages you to put your name to your allegation whenever possible.

- 3.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Senior Leadership Team/Proprietor.
- 3.3 In exercising this discretion the factors to be taken into account would include:
- the seriousness of the issues raised
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from attributable sources.

4 Untrue allegations

- 4.1 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.
- 4.2 Further information on whistleblowing is available from the independent whistleblowing charity Public Concern at Work.
- 4.3 You can get free, confidential advice from Public Concern at Work. If you have witnessed wrongdoing at work and are unsure about what to do, a Public Concern at Work adviser can help you to decide whether and/or how to raise your concern. You can call on 020 7404 6609 or email helpline@pcaw.co.uk.
- 4.4 You can visit their website for further information: <https://www.pcaw.co.uk/>. The website has guidance on whistleblowing legislation.

5 Reporting the concern

- 5.1 In cases where colleagues do not feel that their concern is being addressed, a concern can be sent to the Head of School, or one of the Principals, or the Head of HR. If the concern is not addressed by one of these senior leaders, colleagues can send their concern to the Chair of the Advisory Board, Daniel Jones via email (daniel.jones@naceschools.com) or via post (7b Wyndham Place, London W1H 1PN).

6 Parent Concerns: Reporting Concerns About the School to the Independent Schools Inspectorate (ISI)

- 6.1 The following is taken directly from the ISI website.
- 6.2 If you wish to raise a concern about a school, you can email concerns@isi.net or call 020 7600 0100 and ask to talk to an appropriate member of staff. If the conversation cannot take place immediately, we will arrange a time for someone to contact you. All such communications are confidential and never divulged to the school. All concerns are taken seriously. At the very least a note will be taken and drawn to the attention of the Reporting Inspector leading the next inspection of the school. Please see our privacy notice in relation to how your personal data will be processed.

Parents are encouraged to raise their concerns directly with the school, if necessary using the school's formal complaints procedure – and if you wish you may copy ISI in on any correspondence. If you remain dissatisfied at the end of the process, you may inform ISI and, if it appears that a school may be in breach of any regulatory requirements or there is a serious or safeguarding concern, ISI would normally refer the matter to the Department for Education (DfE).

REFERENCES

1. [Whistleblowing for Employees](#)
2. [Concerns about a School, ISI](#) – Parent Overview