



CONFIDENTIAL REPORTING POLICY

'WHISTLEBLOWING PROCEDURE'

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1. INTRODUCTION

The school's senior management team acknowledges that employees are often the first to realise that there may be something seriously wrong within a school. However, they may refrain from expressing their concerns because speaking up would be disloyal to their colleagues or the school. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice. This policy is designed to encourage employees to report any concerns by giving them confidence that their concerns will be thoroughly investigated and they will be protected from retaliation.

The policy encourages employees to raise such concerns using the internal mechanisms below. This policy clarifies that employees can do so without fear of victimisation, subsequent discrimination, or disadvantage. This Confidential Reporting Policy is intended to encourage and enable employees to raise serious concerns *within* the school, rather than overlook a problem or 'blow the whistle' publically.

This policy protects workers who 'blow the whistle' about wrongdoing. It makes provisions about the kinds of disclosures which may be protected, the circumstances in which the disclosures are protected, and the persons who may be protected. The provisions introduced by the policy protect most workers from being subjected to a detriment by their line manager. Detriment may take several forms, such as denial of promotion, facilities, or training opportunities, which the employer would otherwise have offered.

ISL is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment, ISL expects employees and other members of the wider community with serious concerns about any aspects of the school's financial, legal or child protection practices to come forward and voice those concerns. It is recognised that most cases will have to proceed confidentially.

The policy applies to all employees and those contractors or vendors working for ISL on their premises.

The School will ensure that all are made aware of this policy. This policy does not apply to ordinary grievances such as but is not limited to concerns about homework, curricula, and school fees, in which case the Grievance Policy and Procedures should be applied.

2. AIMS AND SCOPE OF THIS POLICY

This policy aims to:

- a) encourage employees and others to feel confident in raising serious concerns and to question and act upon concerns about practice;
- b) provide avenues for employees and others to raise those concerns and receive feedback on any action taken;
- c) ensure that employees and others receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied; and
- d) reassure employees and others that they will be protected from possible reprisals provided the person discloses in good faith, reasonably believes that the information and any allegation it contains are substantially true and does not act for personal gain.

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The Confidential Reporting Policy is intended to cover significant concerns that fall outside the scope of other procedures. These include:

- a) conduct which is an offence or a breach of law;
- b) disclosures related to miscarriages of justice;
- c) serious health and safety risks, including risks to the public as well as other employees;
- d) serious damage to the environment;
- e) the unauthorised use of public funds;
- f) possible fraud and corruption;
- g) sexual or physical abuse;
- h) other unethical conduct;
- i) racism; or
- j) action to conceal any of the above.

Any serious concerns about items listed above that staff or community have regarding ISL employees' conduct can be reported under the Confidential Reporting Policy.

This policy does **not** replace the school's complaints/grievance procedure.

3. SAFEGUARDS

ISL and the school are committed to good practice and high standards and want to support employees, students, and parents.

ISL recognises the difficulty of deciding whether to report a concern. Employees, students, or parents should have nothing to fear if they genuinely believe what they are saying is accurate because it is a duty to the employer and those for whom they provide a service.

ISL and the school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect employees or students in good faith when a concern has been raised.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect an employee.

4. CONFIDENTIALITY

All concerns will be treated in confidence, and every effort will be made not to reveal the employees', students', or parents' identity if they do not wish to. However, staff may be required to come forward as witnesses at the appropriate time.

5. ANONYMOUS DISCLOSURES

This policy encourages the person making the allegation to put their name to a disclosure whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Head of School (or representative).

In exercising this discretion, the factors to be considered would include the following:

- a) the seriousness of the issues raised;
- b) the credibility of the concern; and
- c) the likelihood of confirming the allegation from attributable sources.

6. UNTRUE DISCLOSURES

If a disclosure is made in good faith but is not confirmed by the investigation, no action will be taken against the person making the allegation. If, however, a person makes one or more disclosures frivolously, maliciously or for personal gain, disciplinary action may be taken, which could include dismissal for employees and withdrawal for students.

7. HOW TO RAISE A CONCERN

The earlier concerns are expressed, the easier it is to take action. Staff may wish to speak to their line manager or colleague before making a disclosure. Staff may also find it easier to raise the matter if two (or more) staff have had the same experience or concerns. Students or Parents should raise their concern with the appropriate principal.

Employees need to be aware that the same obligations bind their colleagues as they are themselves, relating to confidential information. If employees share confidential information with line managers or others with a view to using this procedure, they will need to ensure that the confidential information is not misused.

The first stage requires concerns to be raised with the employee's immediate supervisor. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the employee believes that the Head of School is involved, the Chair of the Board should be contacted instead. In cases where the Head of School and Chair of the Board are suspected of being involved, the Vice Chair of the Board may be used. Students or Parents would follow this same procedure if they were concerned about the principal or Head.

Concerns may be raised verbally or in writing. People who wish to make a written report are invited to use the following format:

- a) the background and history of the concern (giving relevant dates); and
- b) the reason why they are particularly concerned about the situation.

Although staff, students or parents are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern.

Employees may seek advice or guidance from Human Resources on pursuing matters of concern.

A line manager, work colleague or a friend may be present during any meetings or interviews concerning the concerns raised.

8. HOW ISL WILL RESPOND

ISL will respond to concerns. Testing out concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

- a) be investigated by, the senior leadership team, or through the school's disciplinary procedures, or the school board,
- b) be referred to the police; and/or
- c) form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle that ISL will have in mind is the public interest. Concerns or allegations that fall within the scope of specific procedures (for example, child protection or discrimination issues) will usually be considered under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. On occasions, urgent action may be required to be taken before any investigation is conducted.

Within five working days of a concern being raised, the responsible person (the Head of School or Board Chair, in the case of a concern relating to the Head of School) will write to the person who raised the concern:

- a) acknowledging that the concern has been received;
- b) indicating how it is proposed to deal with the matter;
- c) giving an estimate of how long it will take to provide a final response;
- d) whether any initial enquiries have been made;
- e) provide information on support mechanisms and
- f) telling the person who raised the concern whether further investigations will take place, and if not, why not.

The amount of contact between those considering the issues and the person who raised the concern will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, ISL will seek further information from the person who raised the concern.

An employee can be accompanied by a work colleague, staff representative, or a member of the Senior Management Team at any meeting. If preferred, the meeting may take place away from the workplace.

ISL will take steps to minimise any difficulties that may be experienced due to raising a concern. For instance, if an employee or student is required to give evidence in criminal or disciplinary proceedings, ISL will arrange for this person to receive advice about the procedure.

ISL accepts that the community must be assured that the matter has been adequately addressed and, subject to legal constraints, person who raised the concern will be informed of the outcome of any investigation.

9. THE RESPONSIBLE OFFICER

The Head of School of ISL is responsible for implementing and operating this policy.

10. HOW THE MATTER CAN BE TAKEN FURTHER

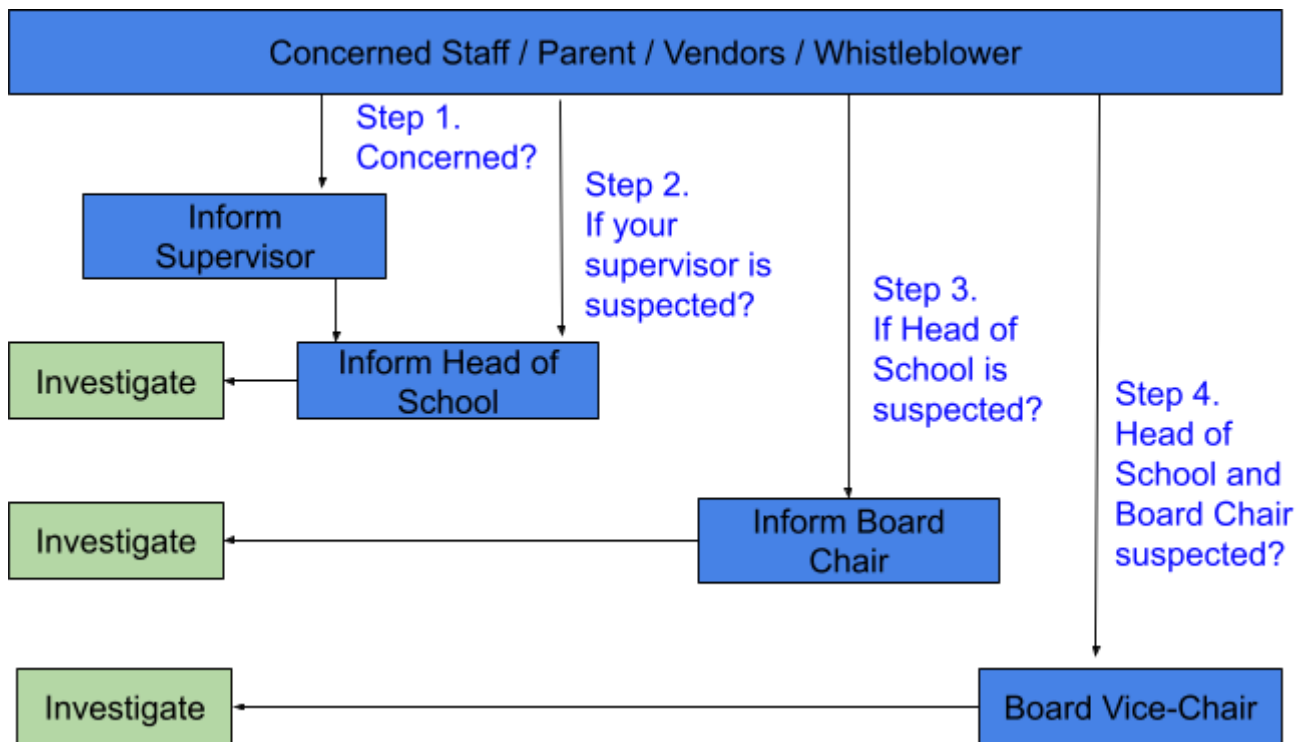
This policy is intended to provide employees and our community members with an avenue within the ISL to raise concerns and hopes employees and others will be satisfied with any action taken. If not, and they feel it is right to take the matter outside, depending on the severity of the action, the police may be contacted.

ISL recognises employees', students' and parents' lawful right to disclose to the police when they believe a law has been broken.

If an employee does take the matter outside the school, s/he should ensure that confidential information is not disclosed. Staff should check with the contact point about matters of confidentiality.

Workers protected by the provisions (including employees) can complain that they have been subjected to detriment by their employer for making a disclosure. An employee can make a claim for unfair dismissal because s/he made a protected disclosure and has been subjected to detriment.

Annex A - Flow Chart of How to Raise a Concern



Annex B - Contacts of Key Personnel at ISL

Contact	Email
Head of School	Email head@isl.sch.zm
Board Chair	Email board.chair@isl.sch.zm
Board Vice-Chair	Email board.vicechair@isl.sch.zm

Annex C - Resources

<https://www.parliament.gov.zm/sites/default/files/documents/acts/Public%20Interest%20Disclosure%20%28Protecti%20of%20Whistleblowers%29%20Act%202010.PDF>