INTERNATIONAL
SCHOOL OF MOROCCO

Whistleblowing
Policy and Procedures

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Contents

Introduction..... 3

Purpose 3

Application of policy..... 3

Scope..... 4

Protection 4

How to raise a concern 5

Investigating a disclosure 5

External disclosure 6

Confidentiality..... 6

Report to Proprietors..... 6

Introduction

The International School of Morocco is committed to maintaining a culture of openness, accountability. and integrity. We seek to ensure that employees and workers at the school feel secure in raising concerns about any activity which may harm individuals or undermine the school. The school has adopted this Whistleblowing policy to provide clear guidance to those who may need to raise concerns. This policy and procedure have been prepared in accordance with the Public Interest Disclosure Act 1998 and DfE guidance for schools.

Purpose

The International School of Morocco expects its employees, and others involved in the work of the school, who have serious concerns about any aspect of the school's work to come forward and raise those concerns. An employee may be the first person to realise that there could be something seriously wrong within the school. However, they may feel that speaking up would be disloyal to colleagues or to the school. They may also fear harassment or victimisation.

This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have raised any concern in good faith.

Application of policy

All employees and workers at the school have a responsibility for whistleblowing. The purpose of this policy and procedure is to make it clear that employees can raise concerns in confidence without fear of victimisation, subsequent discrimination, or disadvantage. Employees are encouraged to raise serious concerns in the first instance within the school rather than overlooking a problem or 'blowing the whistle' outside, and it is preferred that the matter is raised when it is just a concern rather than waiting for proof.

This policy and procedure apply to all employees and those working for the school, for example, agency staff. It also covers those providing services under a contract with the school and organisations working in partnership with the school.

Scope

This policy and procedure are intended to cover concerns that fall outside the scope of other procedures, including the school's complaints procedure and grievance policy.

This policy should be used for concerns about:

- any unlawful act, whether criminal or a breach of civil law
- maladministration
- breach of any statutory code of practice
- breach of, or failure to implement or comply with, Financial Regulations or Standing Orders
- any failure to comply with appropriate professional standards
- fraud, corruption, or dishonesty
- actions which are likely to cause physical/mental/psychological danger to any person, or to give rise to a risk of significant damage to property
- loss of income to the school
- abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose
- discrimination in the provision of education
- any other matter that staff consider they cannot raise by any other procedure

It should be emphasised that this policy and procedure is intended to assist employees or workers who have discovered malpractice or serious wrongdoing, provided they make the disclosure in accordance with the policy. It is not designed to question financial, or business decisions taken by the school, nor may it be used to reconsider any matters that have already been addressed under the harassment, complaint, or disciplinary procedures. Individuals who make disclosures outside the arrangements set out here will not be protected under this policy and may not be protected under the Act.

Protection

It can be difficult for an employee or worker to make the decision to report a concern. If a concern is raised in good faith and based on reasonable belief, there should be nothing to fear. The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect an individual when they raise a concern even if they are genuinely mistaken in their concerns. Any harassment or victimisation of a whistle-blower would result in disciplinary action against the person responsible. Under The Public Interest Disclosure Act 1998, workers are protected from dismissal or other detriment as long as they follow their employers whistle blowing procedure. Any investigations arising from whistleblowing will not influence or be influenced by any other procedures to which an employee may be subject.

If an employee's concern is not confirmed by the investigation, no action will be taken against them. If, however it is determined through an investigation that an employee made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

How to raise a concern

It is hoped that in most cases an employee/worker will feel able to raise any concerns internally with the Director, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving a concern quickly and effectively.

Where the concern relates to the Director, the employee/worker should raise the concern with the Advising Board member in charge.

The Advising Board member in charge will meet with the employee/worker as soon as practicable to discuss their concern. Recording sufficient details to enable the matter to be thoroughly investigated. As a minimum, they will record the name of the employee/worker but also indicate whether the individual wishes his or her identity to remain confidential and the nature of the concern.

It may not always be possible to maintain confidentiality and the Director should explain this to the employee/worker. In such instances, the employee/worker will have the choice of either withdrawing or agreeing to his/her identity becoming known to enable the concern to be effectively dealt with.

The Advising Board member in charge will take notes and produce a written summary of the concern raised and provide the employee/worker with a copy as soon as practicable after the meeting, along with an indication of how they propose to deal with the matter, where possible.

Investigating a disclosure

Once an employee/worker has raised a concern, the Advising Board member in charge will carry out, within 10 working days, an initial assessment to determine the scope of any investigation. The employee/worker will be informed of the outcome of this assessment. The employee/worker raising the concern may be required to attend additional meetings in order to provide further information.

The Advising Board member in charge may consider it appropriate to refer the concern to an external agency for consideration in advance of any internal investigation. This may be appropriate where concerns about child safeguarding, potential criminal activity or unsafe working practices are raised. Where this is deemed appropriate, no further internal investigation should be undertaken until clearance is given.

Where necessary, the school may appoint an investigator or team of investigators, including those with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school to minimise the risk of future wrongdoing. The Advising Board member in charge will aim to keep the employee/worker informed of the progress of the investigation and likely timescale. Sometimes the need for confidentiality may mean that the employee/worker cannot be given specific details of the investigation, or any disciplinary action taken as a result. The employee/worker is required to treat any information about the investigation as strictly confidential.

If it is concluded that an employee/worker has made false allegations maliciously, in bad faith or with a view to personal gain, they will be subject to disciplinary action under the school's disciplinary policy and procedure.

Whilst it cannot always be guaranteed that the outcome will be in line with the employee's/worker's expectation, concerns will be dealt with fairly and in an appropriate way.

There is no right of appeal against any decisions taken under this policy and procedure.

External disclosure

Employees or workers who believe that the matter has not been taken seriously or is being covered up may choose to report the concern externally to an appropriate body, details of which are shown below:

- The EDT - https://edt.org/inside-edt/contact-edt/
- a Prescribed Person or Body (eg. Ofsted, Education Funding Agency, Children Commissioner or NSPCC – https://www.gov.uk/government/publications/blowing-the-whistle-list-ofprescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-peopleand-bodies
- Moroccan local authorities

Confidentiality

The Advising Board member in charge view confidentiality as a two-way process and will endeavour to maintain this approach, though they recognise this cannot always be guaranteed. In return we would expect concerns the employee/worker has raised through this policy will remain equally confidential until there has been an opportunity for their assessment.

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the employee/worker raising the concern if that is their wish. If the school are not able to resolve the employee's/worker's concern without revealing their identity, it will be discussed with them beforehand.

The Advising Board member in charge also wishes to state that although a concern may also be raised anonymously, it may impede the designated managers ability to undertake a thorough assessment if the employee/worker chooses to do so. The Advising Board member in charge would hope that the protection provided by this policy would negate the need for such actions. Concerns expressed anonymously are much less powerful but may be considered by the school taking into account:

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

The Proprietors' representative will decide in each case whether a complaint made anonymously should be investigated.

Report to Proprietors

The Advising Board member in charge will report to proprietors the outcome of whistle blowing investigations, anonymising the detail but confirming the outcome and any school actions arising from the investigation.