

# Kuwait International English School



## Whole School Whistleblowing Policy

## **INTRODUCTION**

Members of staff are often the first to realise that there may be something seriously wrong within the school. However, they may not express their concerns because they feel that speaking up would be disloyal to others or to 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.

Al Rayan Holding Company and KIES are committed to the highest possible standards of openness, probity and accountability. In line with that commitment we wish to encourage members of staff with serious concerns about any aspect of the School's work to come forward and voice those concerns.

This policy document makes it clear that all can do so without fear of reprisals and recognises that some cases will have to proceed on a confidential basis. The policy is intended to encourage and enable staff to raise serious concerns, in a responsible fashion, within the school rather than overlooking a problem or blowing the whistle outside.

All members of staff of the School will be made aware of this policy.

## **AIMS AND SCOPE OF THIS POLICY**

This policy aims to:

- provide avenues for members of staff to raise concerns and receive feedback on any action taken;
- allow members of staff to take the matter further if they are dissatisfied with a response; and
- reassure members of staff that they will be protected from reprisals or victimisation for whistleblowing in good faith.

There are already existing procedures in place to enable staff to lodge a grievance relating to their own employment. Staff have the option to approach school senior leaders and managers at AL Rayan HR Department with any issues. This whistleblowing policy is intended to cover concerns that fall outside the scope of those procedures.

Those concerns may, for example, be about something that:

- is unlawful;
- is against School's financial regulations or policies;
- falls below established standards or practice;
- amounts to improper conduct;
- is a health and safety risk; or
- is an environmental risk.

## **HOW CONCERNS CAN BE RAISED**

As a first step, a member of staff should normally raise concerns with their line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if it is believed that the line manager is involved, the member of staff should approach the Principal or HR Manager. Where it is thought the Principal is involved, the matter should be referred to the HR Manager or Al Rayan CEO.

Concerns are better raised in writing as such staff will be invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why they are particularly concerned about a situation. If they do not feel able to put their concern in writing, they can meet with the Principal or HR Manager.

The earlier they express the concern, the easier it will be to take action.

Although members of staff will not be expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for their concern.

## **HOW THE PRINCIPAL / HR MANAGER / CEO WILL RESPOND**

The action taken by the relevant party will depend on the nature of the concern. The matters raised may:

- be investigated internally.
- be referred to the Ministry of Education.
- be referred to the Police or other relevant authorities.

In order to protect individuals and the School / Holding Company, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection) will normally be referred for consideration under those procedures. (See appropriate policies)

Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of a concern being received, the concerned party will contact the member of staff:

- acknowledging that the concern has been received;
- indicating how it is proposed that the matter should be dealt with;
- giving an estimate, if possible, of how long it will take to provide a final response;
- telling the individual whether any initial enquiries have been made; and
- telling the individual whether further investigations will take place, and if not, why not.

In some circumstances it may not be practical to provide the member of staff with all this information but, the individual will be regularly informed of the progress of investigations.

The amount of contact between the parties considering the issues and the member of staff, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary further information will be sought from the member of staff.

When any meetings are arranged, staff will have the right, if they so wish, to be accompanied by a friend who is not involved in the area of work to which the concern relates.

The person considering the issues will take steps to minimise any difficulties which the member of staff experience as a result of raising a concern. For instance, if the individual is required to give evidence in criminal or disciplinary proceedings, they will be advised about the procedure.

It is accepted that the member of staff needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive information about the outcomes of any investigations.

### **CONFIDENTIALITY**

The Holding Company, School and Principal will do their best to protect the identity of staff when they raise a concern and do not want their names to be disclosed, but this cannot always be guaranteed. It must be appreciated that the investigation process may reveal the source of the information and a statement by staff member may be required as part of the evidence.

### **ANONYMOUS ALLEGATIONS**

This policy encourages members of staff to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the concerned parties.

In exercising the 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.

### **UNTRUE ALLEGATIONS**

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against the complainant. If, however, a member of staff makes malicious or vexatious allegations, disciplinary action may be taken.

## **SAFEGUARDS AGAINST HARRASSMENT OR VICTIMISATION**

AL Rayan Holding Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. Al Rayan Holdings will not tolerate harassment or victimisation and will take action to protect children and staff when they raise a concern in good faith.

## **HOW THE MATTER CAN BE TAKEN FURTHER**

This policy is intended to provide members of staff with an avenue to raise concerns within the Company and to reassure them that those concerns will be properly investigated and appropriately responded to on Al Rayan Holdings behalf. If they are not satisfied with the outcome and if they feel it is right to take the matter outside the School, the following are possible contact points:

- Ministry of Education
- The Police.

If they do take the matter outside the School, they will need to ensure that they do not disclose confidential information or that disclosure would be privileged. It will be advisable for them to check this point out in relation to the issues about which they raised concerns.

## **RESPONSIBLE OFFICERS**

Al Rayan Holding Company, has overall responsibility for this policy. The school is responsible for the maintenance and operation of this policy, and any concerns relating to the policy, or its operation should in the first instance be addressed to the School Principal. The Principal will be responsible for implementing the policy within the school.

The policy will be subject to annual review and evaluation.