# WHISTLE BLOWING POLICY

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| **Reviewed:** | August 2026 |
| **Next Review Due:** | July 2027 |
| **Applies To:** | Whole School (inc. Board) |
| **Owner:** | Head of School |
| **Approved By:** | Board of Directors |

## Mission, Vision and Values

### Mission
To inspire our children to reach their full potential by fostering curiosity and an interest in learning, awakening their minds and illuminating their world.

### Vision
To create an affordable international secondary school with a high standard of education where children learn through practical and project-based work. To develop our students' moral and intellectual capacity, and to encourage creativity and adaptability.

### Aim
An education that is broad, balanced and challenging, with an emphasis on developing strong connections to our host country, Uganda.

### Values
Desire for lifelong learning; an ability to adapt; be innovative and reflective thinkers; open minded, and empathetic while achieving high academic success according to individual potential.

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## 1. Purpose & Principles

7Hills International School (7Hills) is committed to:

- high standards of integrity, accountability and ethical conduct
- a culture of transparency and professional responsibility
- encouraging staff to raise genuine concerns without fear of reprisal
- ensuring concerns are investigated fairly, promptly and sensitively

This policy:

- provides clear routes for raising concerns
- explains how disclosures will be handled and investigated
- sets out protection for staff who raise concerns in good faith
- distinguishes whistleblowing from employee grievances

This policy does not replace staff grievance or complaints procedures.

## 2. What Counts as Whistleblowing?

A whistleblowing concern is one raised in the public interest, relating to suspected:

- criminal activity, fraud or corruption
- breach of legal, financial or regulatory obligations
- safeguarding failures or unsafe practice
- serious breach of professional standards or school procedures
- risk to health, safety or the environment
- misuse of school funds or resources
- abuse of power, malpractice, or unethical behaviour
- attempts to conceal wrongdoing

A personal employment concern is normally a grievance, not a whistleblowing matter. If uncertain, staff may seek confidential advice or speak with a senior leader before deciding which route to use.

## 3. Commitment to Protection & Non-Retaliation

No employee will be dismissed, disciplined, harassed and victimised for raising a concern in good faith, even if it is later found to be mistaken. Malicious or knowingly false allegations may result in disciplinary action and an instruction to cover up wrongdoing is itself misconduct.

## 4. Confidentiality & Anonymous Reporting

7Hills will:

- protect the identity of a whistleblower wherever reasonably possible
- restrict disclosure to those directly involved in investigation

Anonymity may limit investigation and cannot always be guaranteed where legal or safeguarding duties apply. Anonymous disclosures will be considered where:

- allegations are serious
- evidence appears credible
- the concern may be verifiable through other sources

## 5. Safeguarding & Child Protection Concerns

Any concern relating to:

- abuse
- neglect
- grooming
- unsafe contact
- child protection risk

must be reported immediately to the Designated Safeguarding Lead (DSL) and where necessary, external statutory referrals will be made.

## 6. How to Raise a Whistleblowing Concern

### 6.1 Stage 1 - Internal reporting

Concerns should normally be raised with:

- Line Manager or Head of Department

If inappropriate due to involvement or sensitivity, staff may instead report to:

- Head of School
- Deputy Head / Senior Leadership
- Chair of the Board (if related to Head or Deputy Head of School)

Reports should be made in writing where possible, including:

- nature of the concern
- dates, times, locations
- names of those involved
- relevant evidence
- any personal interest declared

### 6.2 Stage 2 - Acknowledgement & Initial Review

The recipient will:

- acknowledge the concern within 5–10 working days
- assess whether whistleblowing criteria are met
- decide whether investigation is required
- confirm next procedural steps and timeframes

### 6.3 Stage 3 - Investigation

An investigation may be conducted by:

- a senior leader
- Board representative
- an independent / external investigator
- police or regulatory body (if warranted)

The whistleblower will be:

- treated with dignity and fairness
- kept informed where appropriate
- advised if confidentiality limits apply

Where misconduct is proven, disciplinary or regulatory action may follow.

### 6.4 Stage 4 - Outcome

A formal outcome will state:

- whether wrongdoing was identified
- corrective actions taken
- whether referral to external agencies was necessary

Full details may be limited where confidentiality applies.

## 7. Escalation if the Reporter Believes Action Was Not Taken

If the staff member reasonably believes:

- the concern was not properly investigated, or
- there remains risk of harm or malpractice

they may escalate to:

- Chair of Board
- Board Committee for Governance

If still concerned, they may report to:

- statutory regulators
- safeguarding bodies
- external auditors
- recognised prescribed bodies

This should be done responsibly and without disclosing confidential or sensitive information unnecessarily.

## 8. Malicious or Vexatious Allegations

No disciplinary action will occur where concerns were raised in good faith and proved unfounded. Where allegations are knowingly:

- false
- fabricated
- made for personal gain

## 9. Monitoring & Record Keeping

A secure whistleblowing register will record:

- date concern received
- category of concern
- investigation route
- outcome summary
- referral actions (if any)

Access is restricted to governance oversight.

## 10. Links with Other Policies

This policy should be read with:

- Safeguarding & Child Protection Policy
- Complaints Policy
- Staff Code of Conduct
- Financial Controls Policy
- Grievance & Disciplinary Procedures

## 11. Policy Review and Approval

This policy will be reviewed annually or as required to reflect changes in legislation, CIS standards or school practice.

## 12. Distribution and Access

This policy is available to all staff, students, and parents via the school website and on the school Google drive. Printed copies can be requested from the school reception.

## Appendix 1 - Whistleblowing Concern Reporting Form

| | |
|---|---|
| Name of person raising concern (leave blank if anonymous) | |
| Role / Department | |
| Date concern submitted | |
| Category of concern | financial / safeguarding / conduct / legal / health & safety / other |
| Details of concern (facts only — include names, dates, locations, evidence where applicable) | |
| How did you become aware of this concern? | |
| Have you raised this concern with anyone previously? | Yes/No |
| Do you believe there is an immediate risk of harm? | Yes/No |
| Preferred contact method (optional) | |
| Signature(if applicable) | |
| | |
| Received by (name & role) | |
| Date received | |

## Appendix 2 - Initial Review & Triage Record

| | |
|---|---|
| Reference number | |
| Date of review | |
| Reviewer (name & role) | |
| Summary of allegation | |
| Meets whistleblowing criteria? | Yes/No |
| Safeguarding threshold reached? | Yes/No |
| Immediate protective actions taken | |
| Decision | no further action / internal investigation / external referral / disciplinary route |
| | |
| Assigned investigator / lead | |
| Target timeframe for response | |
| Communication sent to whistleblower (date / summary) | |
| Notes | |

## Appendix 3 - Investigation Plan & Evidence Log

| | |
|---|---|
| Case reference | |
| Investigator(s) | |
| Scope of investigation | |
| Questions to be determined | |
| People to be interviewed | |
| Documents / data to be reviewed | |
| Evidence log | item / source / date / relevance |
| Risk considerations | confidentiality / retaliation / legal |
| Support provided to involved parties | |
| Interim findings (if applicable) | |
| Target completion date | |

## Appendix 4 - Investigation Outcome & Decision Record

| | |
|---|---|
| Case reference | |
| Date investigation completed | |
| Investigating officer(s) | |
| Finding | substantiated / partially substantiated / not substantiated |
| Summary of evidence considered | |
| Actions taken | disciplinary / safeguarding / financial / policy / training |
| External referrals made (agency / date) | |
| Outcome communicated to whistleblower (date / format) | |
| Outcome communicated to subject of allegation (date / format) | |
| Recommendations for organisational learning | |
| Board / Governance review (date) | |
| Case closed (date / signed by) | |

## Appendix 5 - Whistleblowing Register

| Ref No. | Date Received | Category | Received By | Investigation Route | Outcome | External Referral? | Date Closed |
|---|---|---|---|---|---|---|---|
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## Appendix 6 - External Referral & Escalation Record

| | |
|---|---|
| Case reference | |
| Reason for external referral | |
| Agency / regulator contacted | |
| Contact person (if applicable) | |
| Date & method of referral | |
| Information shared (summary) | |
| Safeguarding considerations documented | |
| Follow-up actions agreed | |
| Date of agency response | |
| Further actions required | |
| Recorded by / role | |
| Date logged | |