

DUBAI HEIGHTS ACADEMY



Policy	Whistleblowing Policy
Approved on	22 August 2022
Approved by	Principal
Review date	August 2023



POLICY STATEMENT

Dubai Heights Academy is committed to maintaining a culture of honesty, transparency and candour in all its activities, including school operations. It is important that employees at the school feel secure in raising concerns that may cause harm to colleagues or students and/ or undermine the reputation of the school. The Whistleblowing policy serves as a clear guideline to staff for voicing their concerns in an appropriate manner, so that these can be addressed at the earliest opportunity.

WHAT IS WHISTLEBLOWING

Whistleblowing is the term used to describe the process that takes place when a staff member discloses information regarding a wrongdoing in the workplace that is in public interest. This may involve an individual or a group of individuals involved in an inappropriate, unethical or illegal act.

AIMS

The purpose of the policy is to:

- Encourage employees to feel confident in raising concerns regarding inappropriate behaviour of other staff members
- Provide a clear process for whistleblowing concerns to be raised and addressed
- Ensure whistleblowers are protected from reprisals or harassment for raising a concern in good faith
- Ensure a response is received to a concern raised
- Provide the employee with further steps of escalation, if they are not satisfied with the response received

1. SCOPE OF POLICY

This policy applies to all employees of Dubai Heights Academy and also to external providers who are contracted by the school.

This policy is intended to cover concerns regarding actions that can be defined as inappropriate, unethical or illegal and may include the following:

- any unlawful act, whether criminal or breach of UAE law
- abuse of authority
- fraud, bribery, corruption
- serious health and safety issues
- actions which are likely to cause physical/mental/psychological harm to any person
- actions which may cause serious damage to the school property
- discrimination in the provision of education
- miscarriage of justice in an investigation
- actions which may cause significant loss of income to the school
- breach of the schools Code of Conduct
- any other matter that staff consider they cannot raise by any other procedure

It must be noted that any allegations made under the whistleblowing policy with a malicious intent to deliberately undermine the reputation of an employee, may result in an internal investigation and if found true, the whistleblower shall be subjected to disciplinary actions which may lead to dismissal.

2. WHISTLEBLOWING PROCEDURE

2.1 Step 1: Making a disclosure

- Before making a disclosure an employee should be fully aware of the reasons for the allegation and provide any evidence if possible. The concern should initially be raised with their own line manager, unless the disclosure concerns their line manager, in which case the matter must be raised directly with the Principal.
- If the matter is a safeguarding concern, then it should be raised immediately with the Designated Safeguarding Lead. It is not necessary to investigate or provide evidence in case of a safeguarding concern, as this should only be reported and any further investigation in this matter will be taken over by the Designated Safeguarding Lead.



- The concern may be raised verbally or in writing and should clearly outline the background and the nature of the allegation and the reasons why the employee is concerned. The concern should include details of the names of the individual(s) against whom the allegations are made.

2.2 Step 2 : Role of Line Managers

- It is the responsibility of all line managers to act on any whistleblowing concerns raised with them, according to the scope of this policy. They may investigate the matter further and if possible gather more evidence to substantiate the concern.
- The line manager must inform the whistleblower of the status of the concern and the outcome of the investigations done.
- All Whistleblowing concerns must be reported to the Principal by the line managers. If the matter has been successfully resolved by the line manager, the details of the investigation and the reasons for the conclusion must be shared with the Principal.

2.3 Step 3: Role of the Principal & Vice Principal

- If the matter has not been successfully resolved by the line manager, then the Principal will initiate further investigations in accordance with the School's policies and procedures. The Vice Principal and SLT may be involved in driving further investigations, unless the matter concerns them personally.
- The employee who raised the concern initially may be required to attend additional meetings in order to provide further information.
- Based on the outcome of the internal investigation, the Principal may consider it appropriate to refer the concern to an external agency for consideration if the matter is of a criminal nature or is a breach of the laws of the country.
- If required and after consultation with the Governing board, the school may appoint an external investigator or a team of investigators with relevant experience in the subject matter. The investigator(s) may make recommendations for changes to be implemented to minimise future risk of wrongdoings.
- The Principal will keep the Governing Board informed of any whistleblowing concerns that have been raised and the status of any ongoing investigations into the matter.
- The Principal will aim to keep the whistleblower informed of the progress of the investigation. However sometimes the need for confidentiality may mean that the employee will not be given specific information regarding the investigation or any disciplinary action taken as a result. Any information shared with the employee must be kept strictly confidential.
- Whilst it cannot always be guaranteed that the outcome will be as per the whistleblower's expectation, there is the assurance that it will be dealt with fairly and in accordance with the School's policies and procedures.
- The individual who is subject to the disclosure will be given a chance to submit evidence to counter the allegation in line with the Staff Complaints & Resolutions Policy. They will be informed of the ongoing investigations and will receive a written outcome and further steps of action once the investigation has been completed.
- A final report regarding the whistleblowing concern will be maintained by the school with details of the allegation, the individual(s) involved, the nature of investigations done and findings thereof as well as the decision taken by the management regarding the outcome.
- If the whistleblowing concern is regarding an individual, a report will be maintained in the staff personnel file.
- If the concern is regarding the Principal the employee will raise it initially with the Vice Principal who will then take this directly to the Governing board, explaining the reasons for the concern and the evidence to support the allegation.

2.4 Step 4: Role of the Governing Board

- The Governing board in this instance will carry out an independent investigation. The Principal will be informed of the allegation and will be given the chance to provide evidence to counter the allegation.
- A final decision will be taken by the Governing Board in this matter, based on the outcome of the investigation.



3. PROTECTION FOR WHISTLEBLOWERS

- Any employee at DHA should not feel uncomfortable raising a whistleblowing concern as it is an expression of their commitment to the School's values and ethos and a professional duty of care to the school community.
- DHA will not tolerate any harassment or victimisation of the individual raising the concern and will take appropriate action to protect an individual even if they are genuinely mistaken in their concerns.
- If an employee requests that their identity be protected, the school will, as far as possible, maintain their anonymity in the investigation process. If the situation arises, where it is necessary to disclose the whistleblower's identity, the school will discuss this with the individual and decide on the best course of action. However it must be understood that, depending on the nature of the allegation and the course of investigation, the school may be bound by law to disclose the identity of the whistleblower, especially if an external agency such as the police may be involved.

4. ANONYMOUS ALLEGATIONS

The school discourages staff from making anonymous allegations as this may impede the line manager or the Principal from undertaking a thorough assessment of the concern. Anonymous concerns may be taken into account based on the following :

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

The Principal will decide in each case whether a complaint made anonymously should be investigated.