



THE REGENT SECONDARY SCHOOL

Whistleblowing Policy

Reviewed by the Principal: October 2024
Previous Review: August 2022
Next Review: October 2025
Approved by the Board: October 2024

RATIONALE

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriage of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

ABOUT THIS POLICY

The School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. However, all organisations risk things going wrong occasionally, or illegal or unethical conduct unknowingly occurring. A culture of openness and accountability is essential to prevent such situations and address them when they occur.

AIMS

The School's policy on whistleblowing is intended to demonstrate that we:

- Will not tolerate malpractice;
- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate;
- Respect the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will only invoke the school's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations. The policy seeks to reassure staff that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken; and
- Provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

SCOPE OF THIS POLICY

This procedure is separate from the School's adopted procedures regarding complaints and grievances. Individuals should not use the whistleblowing procedure to raise concerns relating to their personal circumstances, such as the way they have been treated at work. In those cases, the school's complaints and grievances procedures should be used, as appropriate. If you are uncertain as to whether something is within the scope of this procedure, you should first seek advice from your line manager or the Registrar.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment (negligence).

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, including the relevant national authority in Nigeria.

CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, then the police will be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals should discuss this with the Principal, Vice Principal Pastoral, or the Registrar

and appropriate measures can then be taken to preserve confidentiality.

RAISING A WHISTLEBLOWING CONCERN

We hope that in most cases you will be able to raise any whistleblowing concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Principal, Vice Principal Pastoral, or the Registrar.

However, where the matter is more serious, or where you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you may raise a whistleblowing concern to the Principal, Vice Principal Pastoral, or the Registrar directly. If you feel unable to approach the Principal, Vice Principal Pastoral, or Registrar directly, then you may contact the Proprietress (proprietress@regentschoolabuja.com).

A meeting will be arranged with you as soon as possible to discuss your concerns. You may bring a colleague to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and promptly, and appropriate corrective action will be pursued. You will be kept informed of the progress of the investigation and its likely timescale. Whenever possible and subject to third-party rights, you will be informed of the resolution. However, sometimes the need for confidentiality will prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with, you will have a right to raise it in confidence with the Proprietress as above.

MALICIOUS ACCUSATIONS

False, malicious, vexatious or frivolous accusations will be dealt with under the School's disciplinary procedures.

PROTECTION FROM REPRISAL OR FROM VICTIMISATION

Understandably, whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following these Whistleblowing Procedures. If you believe that you have suffered any such treatment, you should inform the Principal, Vice Principal Pastoral, or the Registrar immediately. If the matter is not remedied, you may raise it formally under the School's grievance procedures, located in the Staff Conditions of Service, paragraph 8.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.