EF ACADEMY

International
Boarding Schools

OXFORD WHISTLEBLOWING POLICY

Document title:	Whistleblowing Policy
Date Created:	October 2016
Author:	(previous) Head of School
Individuals Involved in Developing the Document	(originally) Executive Committee of EF Academy Torbay
Document Purpose:	To provide guidance to staff on how to expose organisational misconduct, dishonesty, illegal or unethical activity
Related Documents:	Safeguarding Policy Staff Code of Conduct Keeping Children Safe in Education 2026
Date of Next review:	August 27
Change Log (what changes have been made, by who and when): policy adapted from EF Academy Torbay by Paul Ellis October 2018 and reviewed by Paul Ellis May'20 - reference to "Director of Global Operations" changed to "VP Operations UK". Aug.'21 (Mark Fletcher-Single): reviewed policy to ensure closer synergy with Safeguarding Policy following advice from Barbara Lewin's Safeguarding training (Nov.'20), and to reflect the School's leadership restructure during academic yr. Aug.'21 to Jul.'22 Sept.'22 (Tina Desmond) : reviewed policy for greater definition of protection for employees Aug.'23 (Matthew Foster): reviewed policy to ensure consistency with updated Safeguarding Policy and for legal consistency; developments also made to reflect the School's leadership restructure beginning from Sept.'23 Oct.'23 (Mark Fletcher-Single): developed procedure to directly include VP Operations of EF Academy over '...President of EF Academy *and* VP Operations...' September '26 – brought in line with changes to KCSiE 2026	

What is Whistleblowing?

Whistleblowing is exposing organisational misconduct, dishonesty, illegal or unethical activity. If an individual working for EF Academy has a genuine belief that managers or colleagues are not acting appropriately, the individual is obliged to raise this at the most appropriate level. This whistleblowing process enables employees to do this safely and without reprisal within EF Academy wherever an individual may work. In addition to this recommended and supportive internal approach, EF Academy recognises that individuals genuinely reporting malpractice via professionally-recognised third parties may also be protected by local legislation.

Under UK legislation, you are a Whistleblower if you are a worker and you disclose certain types of wrongdoing. The wrongdoing you disclose must be in the public interest. This means it must affect others. As a whistleblower you are protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Individuals who make allegations that are made maliciously, or are reported or published

inappropriately, for e.g. through social media, may be subject to disciplinary action. If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised and are covered under the definition of Whistleblowing
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what EF Academy will do

This policy MUST be read alongside EF Academy's Safeguarding Policy. Any concerns raised via the Whistleblowing Policy, that contain allegations of harm or mistreatment of a child (or young person) or lead to concerns that a child (or young person) may be at risk, will immediately trigger the application of the School's Safeguarding Policy and Procedures, which must be followed in full.

Aims of the Policy

The Policy is designed to ensure you can raise your concerns about wrongdoing or malpractice within EF Academy without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within EF Academy and to have confidence that they will be addressed in a timely and appropriate manner.

This policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure you receive a response to your concerns and you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimization if you have made any disclosure in good faith

Scope of this policy

This Policy is intended to enable those who become aware of wrongdoing in EF Academy affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures:

- if your concern relates to your own treatment as an employee (for e.g. harassment, discrimination or bullying),this is not considered to be a protected disclosure under Whistleblowing legislation; as such you should raise the issue through the existing grievance procedures
- if a parent has a concern, it should be raised under the Complaints Policy
- general concerns may be raised in accordance with the Concerns Policy

Who is protected under this policy if they make a disclosure?

The Policy applies to:

- employees of EF Academy
- employees of contractors working for EF Academy, for e.g. electricians and plumbers
- volunteers working with EF Academy

What should be reported?

What types of disclosure are Whistleblowing?
You are protected by law if you report any of the following:

- a criminal offence, for e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for e.g. does not have the right insurance
- you believe someone is covering up wrongdoing

If the conduct of members of EF Academy or others acting on behalf of the School:

- makes you feel uncomfortable in terms of known standards
- are not in keeping with EF Academy's constitution and policies
- fall below established standards of practice, or
- could be considered to be improper behaviour but are not included in the Whistleblowing disclosures above, then they should be raised under the School's Concerns policy

Protecting the Whistleblower **(**i.e. **your legal rights)**

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in good faith.

The Act makes it unlawful for EF Academy to dismiss anyone or allow them to be victimised on the basis they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. EF Academy cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

Harassment or victimisation

EF Academy is committed to good practice and high standards and to being supportive of you as an employee. EF Academy recognises the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

EF Academy will not tolerate any harassment or victimisation of a whistleblower

(including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

Support to you

Throughout this process:

- you will be given full support from the senior leadership team
- your concerns will be taken seriously, and
- EF Academy will do all it can to help you throughout the investigation

For those who are not EF Academy employees, the School will endeavour to provide appropriate advice and support wherever possible.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous allegations

This policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of EF Academy. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, EF Academy will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

Raising a concern

Where there is no immediate or urgent harm being caused to others, employees are encouraged to informally report inappropriate activity at the earliest opportunity. Unless an employee believes their manager is involved in the wrongdoing, the individual should raise their concerns in person with their EF Academy line manager as a 'Whistleblowing Concern'. Where an individual believes their line manager may be involved in the wrongdoing, the individual is advised to contact the Principal.

The individual must provide sufficient information in order that the matter can be looked into. Where the Principal has been informed, they will need to meet with the individual either face-to-face or by telephone. The line manager looking into the inappropriate activity will provide the individual with updates as to progress, so they know the matter is being addressed. The line manager will also notify the individual when he / she believes the matter has been satisfactorily resolved.

If a matter is causing, or may cause, immediate or urgent harm to other individuals or after a month of having informally reported concerns which the individual feels have not been sufficiently addressed or resolved, the individual should write to or email the Principal with a subject heading of 'Formal Reporting of Whistleblowing Concern'. The individual should re-state the original concern and whether they have raised the matter informally. If the individual has raised it informally, they need to provide the name of the line manager they discussed the matter with, what progress updates they have been given; and, why they feel that insufficient action has been taken to address the problem. If the informal report was made to the Principal then the formal reporting of whistleblowing concern should be made to the VP Operations of EF Academy.

What will the School do?

The Principal will arrange to meet with the individual in person or on the telephone. The individual needs to provide sufficient details that the matter can be looked into and may be asked to give a confidential written statement as part of the subsequent investigation. If the individual is not asked to provide a written statement, the Principal will provide the employee with a written summary of their joint discussion. The Principal will either investigate or appoint an investigator. The individual will be kept informed of overall progress and timescales, but not the detail of the investigation.
It is not the individual's role to undertake their own investigation.

Once the individual has formally reported the matter, other than contributing their own personal evidence, the individual must allow the Principal or appointed investigator reasonable time to look into and internally resolve the alleged activity.

The Principal will bring any matters formally reported to the attention of the VP Operations of EF Academy but will not normally identify the individual who originally disclosed the concern.

Upon conclusion of the investigation and consideration of the investigation report, the VP Operations will consider and agree what actions if any are required. The Principal will provide the individual with a summary of the outcome and any actual or proposed actions that can be disclosed without breaching individual confidentiality.

Opportunity to Appeal

If the individual is dissatisfied with the outcome, they must write to or email the VP Operations of EF Academy within five days, explaining why they are dissatisfied with the approach and / or response.

The individual should attach a copy of the:

- original 'Formal Reporting of Whistleblowing Concern' email or letter
- confidential written statement provided by the individual, or
- written summary of their joint discussion with the Principal, and the
- outcome summary provided following consideration by the VP Operations of EF Academy

A formal meeting will be then set up either face-to-face or by telephone with the individual and by the VP Operations of EF Academy. The individual will be provided with a confirmation letter or email within five working days of decisions being made. This represents the highest and final internal escalation route that an individual working for or at EF Academy can pursue.

Please be aware that safeguarding concerns will be dealt with in line with the Safeguarding Policy and Child Protection Procedures.