BRITANNICA INTERNATIONAL SCHOOL, SHANGHAI

Ariston Whistle Blowing Policy

Updated September 2026

1 This policy is to be read in conjunction with the School Grievance and Safeguarding policies. This policy is intended to complement these policies and should only be followed when the nature of the concern falls outside the School Complaints procedure.

2 The difference between making a complaint and blowing the whistle

When someone blows the whistle, they raise a concern about a dangerous practice or an illegal or Safeguarding act that might have an effect on other people or children. The whistleblower is not usually personally affected by the danger or illegality, but is raising an issue to alert others. In the school context this might include an action which does not adhere to approved policies, procedures or regulations.

If someone wishes to make a complaint or to raise a grievance, they consider that they have themselves been poorly treated and so have a vested interest in the outcome of the complaint. Thus, the Grievance procedure is the most appropriate course of action in this case

The school is committed to setting the highest standards possible for staff welfare, probity and accountability. If a member of staff or visitor experiences something which concerns them, they must feel confident that they can speak out in an appropriate manner to an appropriate person without fear of retribution or victimisation. It is the responsibility of all staff to report actions of others they may believe to be wrong.

Any concern raised by a member of staff or volunteer will be taken seriously.

3 This policy will:

- explain how the school will respond to any matters of concern raised by a member of staff under the terms of this policy;
- encourage staff to bring forward any issue of concern and so give confidence to staff that in raising issues they are supported by the school;
- reassure staff that if they do act in good faith, they will not suffer any form of victimisation as a result.

4 This policy applies to any colleague working in the school, be they employed or working voluntarily, and has concerns. Such concerns might relate to the actions of one or more staff that might:

- put children or staff at risk;
- not meet the standards of behaviour normally expected of staff working with children;
- be against the law;
- mean the school is not complying with the rules and policies regarding contract standing orders or other financial matters;
- legally compromise the school either financially or otherwise;
- damage the school grounds, buildings or contents.

5 If a member of staff or volunteer has a concern that falls within the terms of this policy their first action should be to raise the matter with their immediate line manager or senor member of staff.

6 If the concern involves the line manager, the member of staff would need to discuss the matter with the headteacher. If the concern involves the headteacher or if the individual feels the issue cannot be discussed with any school staff the member of staff should contact DoE Michael Clack, michael@orbital.education

7 How the school responds to the concerns raised will depend on the nature of the concerns. In some instances, a senior member of staff will investigate the matter and report their findings to the headteacher who may be able to resolve the matter taking the appropriate action. In other instances, it may be necessary to carry out an investigation by the DoE.

8 A senior member of staff or the DoE will respond to your initial concerns within a period of ten days. They will tell you how they intend to address the matter. If the school requires further information from you, they will inform you of the date of any meeting giving at least five days' notice. You would always be able to bring a friend or adviser with you at any meeting. The school will support whistle blowers throughout the process to mitigate any difficult situations that may arise in school.

9 Whatever the outcome of any investigation no action will be taken against you even if the claims are found to be untrue. Appropriate action would possibly be taken if a malicious, vexatious and unfounded allegation was made with no basis.

10 The school will treat all concerns with sensitivity and, if necessary, in confidence. However, in some instances it would not be possible for the whistle blower to have their anonymity protected. For example, if an allegation related to the safety of a child the evidence may need to involve external agencies. The school will use its discretion in deciding whether to investigate information given to managers from an anonymous source.

11 If the person expressing concerns wishes to appeal against any decision, this appeal must go to the Board of the school via the DoE (address as above). The Board will act in a manner which reflects natural justice and fairness. The decision of the Board will be final.

Examples of Whistleblowing concerns would include

The whistleblowing policy covers a wide range of serious concerns. Some examples of malpractice or wrongdoing are shown below. The list is not exhaustive

- Poor or unprofessional practice which results in children not receiving their entitlement to appropriate health, welfare and educational provision
- Improper / unacceptable behaviour towards a person / child which could take the form of emotional, verbal or sexual abuse, rough handling, oppressive or discriminatory behaviour or exploitative acts for material or sexual gain
- any unlawful activities
- fraud, theft, bribery or corruption
- concerns regarding breaches of Health and Safety
- harassment, discrimination, victimisation or bullying
- leaking confidential information
- undertaking of undisclosed private work which may conflict with duties and responsibilities, especially carried out during working time
- taking gifts or inducements
- inappropriate use of external funding or school budget
- breaches of policies of the School Board
- Misuse of school assets including computer hardware and software, buildings, stores or other resources