



Whistleblower Policy

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1. Purpose and scope

The Swedish School in London is committed to creating and maintaining a culture of openness so that individuals feel encouraged and confident in raising any concerns about suspected misconduct early on.

We also recognise the negative effect that malpractice can have on the school and, therefore, encourage you to raise genuine concerns or any suspicions concerning misconduct.

This policy is intended to cover concerns made in the public interest. If the matter is of an individual or personal nature, it should be pursued through the Grievance Procedure. Examples of this include complaints or concerns relating to discrimination, victimisation, or harassment.

This policy applies to full- and part-time employees, contractors, and agency workers, except if they are genuinely self-employed. It is non-contractual and may be amended by the school at any time.

2. Protection

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment due to voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker disclosed under this policy. Complaints about such behaviour will be handled under the school's Disciplinary Procedure.

3. Legislation and guidance

The Public Interest Disclosure Act 1998 (PIDA), which amends the Employment Rights Act 1996, provides protection for whistleblowers in the UK. The PIDA protects employees and workers who report wrongdoing.

Employees who make "protected disclosures" under the PIDA can claim unfair dismissal if their contracts are terminated due to the disclosures. Additionally, they are protected from other detriments that may result, such as a refusal to offer promotions, facilities, or training opportunities.

Workers who are not employees (for example, independent contractors and workers supplied through an agency) cannot make an unfair dismissal claim but can claim that they have experienced detrimental treatment.

4. Disclosures under this policy

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice or suspected malpractice:

- Safeguarding;
- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery;
- Financial malpractice, impropriety or fraud;
- Attempts to conceal any of the above.

The malpractice can be past, present, or prospective and may have occurred inside or outside the United Kingdom.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the problem you raised is not confirmed by any subsequent investigation.

5. Confidentiality and anonymity

Any disclosure under this policy will be treated as far as reasonably practicable, confidentially and sensitively. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable voicing any concerns openly. However, you may make a disclosure anonymously. Concerns expressed anonymously cannot be dealt with as effectively as open disclosures, as they are often more difficult to investigate.

6. Reporting a concern

In many cases, it will be appropriate for staff members to raise any concerns informally with their closest manager in the first instance, either in person or in writing. It may be possible to agree on a way of resolving the concern quickly and effectively.

However, where the matter is more serious, or the member of staff feels that their closest manager or the management team has not addressed the concern, they should, in the first instance, contact the Chair of the Board via email at chair@swedishschool.org.uk

If the disclosure concerns the Chair, the staff member may email the Deputy Chair at deputychair@swedishschool.org.uk to raise the concern.

The person to whom the disclosure is made will decide whether the matter should be handled under this procedure. If he or she considers that the matter should be dealt with under a different school policy or procedure, s/he will advise the person disclosing the appropriate steps that should be taken.

7. Process

The person to whom the disclosure is made will generally consider the information and decide whether there is a case to answer. He or she will determine whether an investigation should be conducted and what form it should take. This will depend on the nature of the matter raised and may be:

- investigated internally
- referred to the External Auditors
- the subject of independent enquiry

Suppose the person to whom the disclosure is made decides not to proceed with an investigation. In that case, the decision will be fully explained to the individual who raised the concern.

8. Investigation

Any investigation will be conducted sensitively and promptly. The employee will be notified of the intended timetable for the inquiry.

The person to whom the disclosure is made may authorise an initial investigation to establish the relevant facts. The investigator will report his or her findings to the person to whom the disclosure was made, who will then decide if there is a case to answer and what steps, if any, should be taken. This may include setting up a special internal independent investigation or

referencing some external authority, such as the police, for further investigation. The decision may be that the matter would be more appropriately handled under existing procedures for grievance, bullying and harassment, or discipline.

Where a disclosure is made, any person or persons potentially implicated in wrongdoing will be told about it and of the evidence supporting it at an early stage, and they will be allowed to respond. Should an investigation conclude there has been a breach of School discipline, the member or members of staff responsible may, in addition to any civil or criminal proceedings, be subject to disciplinary action under the appropriate disciplinary procedures.

The individual making the disclosure will be informed of what action will be taken where possible. However, the need for confidentiality means it may not be possible to share some of the details, including, for example, specific information about any disciplinary action taken against another member of staff. Staff should treat any information about the disclosure, investigation, or outcome as confidential.

9. Dissatisfaction with the outcome of the process

If you are dissatisfied with the outcome of the investigation, you should raise this with the Chair of the Board, giving the reasons for your dissatisfaction. He/she will respond in writing, notifying you of his/her acceptance or rejection of the need for further investigation and the reasons for this.

You are also free to report the matter to the school inspectorate in England and/or Sweden via their respective websites:

- [The Swedish Schools Inspectorate \("Skolinspektionen"\)](#)
- [Department for Education and Ofsted](#)

10. Training

All staff will receive an appropriate briefing to ensure they are fully aware of their rights and responsibilities under this policy. The policy is available to all employees in the shared folder on Team Drive called "School Policies and Documents". All managers will be fully briefed as to their role in supporting this policy and the appropriate action to take if any disclosure is made to them.

11. Breach of this Policy

The school may invoke the Disciplinary Procedure if the employee is found to have subjected a whistleblower to any form of detrimental treatment. It may also be invoked if the employee has intentionally misled the school concerning any matter, breached this policy in any other way, and/or if the school believes the employee has maliciously made a false allegation.

12. Links with other documents and policies

The Whistleblower Policy is linked to the following policies and documents that can be found in the shared folder on Google Drive ("School Documents and Policies"):

- Teacher or Staff Service Agreement (all employees have a signed copy of the document)
- Staff Disciplinary Procedures
- Staff Grievance Procedures
- Complaints Procedure
- Child Protection and Safeguarding Policy and Procedure