

United World Schools | Whistleblowing Policy

Lead policy author: UWS Operations Manager

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1. Introduction

UWS aims to always act with the highest standards of integrity and honesty. UWS expects all Stakeholders - Trustees, Employees, Volunteers, Suppliers, Contractors and all related parties - to maintain the same standards in everything they do. Everyone involved with UWS is therefore strongly encouraged to report any failure to meet our standards on the part of UWS Stakeholders, activities or operations.

This policy is underpinned by The Public Interest Disclosure Act 1998 (also known as the Whistleblowing Act), that protects workers who report wrongdoing or raise concerns within the workplace. UWS are committed to ensuring UWS Stakeholders and all others are encouraged to come forward and voice their concerns, under the protection of the Public Interest Disclosure Act.

It is the aim of this policy to ensure that all persons are able to report causes for concern that can be considered as an act against Public Interest benefit, or against the benefit of UWS Beneficiaries, which can be defined as misconduct or wrongdoing.

UWS recognises that not everyone will feel comfortable about discussing their concerns internally but would like them to feel confident that they can raise any concern about our activities in the knowledge that it will be taken seriously, and no action will be taken against them.

2. Scope of this Policy

This policy aims to help individuals raise any concerns they may have, which are in the public interest, which they believe has occurred or is likely to occur, and provide clear guidance on how to raise a disclosure and the procedure that will follow. This policy applies to the UK and all areas where UWS operates, including all implementing countries.

UWS is committed to dealing with all disclosures raised in an appropriate and timely manner.

Everyone engaged with UWS is encouraged to use the procedures set out below if they witness or have a concern about any of the following cases, noting that areas of concern are not exclusive to this list.

Area of concern	Examples*
Financial irregularities	Intentional omission or misstatement relating to financial matters or transactions. Fraud, financial impropriety or financial mismanagement. (Further information can be found in the UWS Anti Fraud Policy).
Harassment or discrimination	Harassment- Offensive or unwanted behaviour towards an

	individual or group, either verbal, physical or visual. Discrimination- the unequal treatment of any individual or group, based on their race, gender, social class, sexual orientation, physical ability, religion or other characteristics.
A failure to comply with legal obligations	A failure, refusal or neglect to obey an official order or a determined lack of compliance with applicable administrative rules.
A miscarriage of justice	A failure of a court or judicial system, which could result in the conviction of an innocent person.
Failure to observe the highest standards in dealing with children, staff and stakeholders in UWS Schools	Child safeguarding is the responsibility of UWS to ensure our staff, operations, and programmes do no harm to children, that we do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities. (Further information is outlined in the UWS Child Protection Policy).
A health and safety danger	When an assessment of hazards and or risks can cause injury, harm or death.
An environmental risk or	An actual or potential threat of adverse effects on the environment or on living organisms, on the part of UWS activities.
A concealment of any of these areas of concern.	

There does not have to be proof of the allegations, but there should be a reasonable and genuine belief that the information being disclosed is true. Some allegations may prove to be unfounded but UWS would prefer the issue or concern is raised, as opposed to running the risk of not detecting a problem early on.

3. Procedure

UWS is committed to ensuring that all persons are able to report an issue or raise a concern, that is considered as a Whistleblowing Concern. We recognise the diversity of UWS Stakeholders and variable factors in accessing information and reporting concerns. We encourage all persons to come forward with their concern.

3.a How to raise a concern

In our commitment to ensure all persons are able to report their concern, there are various channels to report your concerns, in a safe and confidential manner.

A report can be made to any UWS Staff Member, Manager, Director or Trustee.

We do encourage that reports are made to an appropriate Line Manager or Supervisor for internal reporting, however you may feel it is more appropriate to raise your concern with the Chief Executive Officer or Chair of Trustees.

The following options are available to all persons both internally within UWS and externally, to include contract partners, suppliers and community level stakeholders and any other persons.

Community Level Reporting (for any community member in UWS implementing areas)	UWS Internal Reporting (for UWS Employees, Volunteers, Contractors and Visitors)	UWS External Reporting (for any persons external to the organisation <i>and</i> Community Level and Internal Reporting)
<p>Reports or concerns can be raised with a UWS Staff Member or Representative.</p> <p>In most cases the Education Officer or Safeguarding Lead may be most appropriate.</p> <p>Country Managers or Country Directors may also be contacted.</p>	<p>Reports or concerns can be raised with an individuals' Line Manager or Supervisor.</p> <p>Concerns can also be raised with a member of the Global Management Team (UWS Directors and Country Directors).</p> <p>Concerns may also be raised directly with the Chair of Trustees or Board member.</p>	<p>Reports can be raised directly with the Chief Executive Officer.</p> <p>Concerns can also be raised directly with the Chair of the Board of Trustees or Board member.</p> <p>Concerns can be sent to the UWS Head Office in the UK. Concerns can also be sent to any Implementing Country Head Office.</p> <p>Concerns can also be raised with the Charity Commission, an external body independent of UWS.</p>

Concerns raised will be accepted in any form to include Verbal, Written and other Communications expressed (sign language/ other visual submissions).

Anonymous Allegations

You are not obliged to submit your name and details when raising a concern. We do encourage, for the purpose of the investigation, details are provided. However, in the cases of anonymous allegations, UWS will process the information in accordance with this procedure, further details below.

In support of our commitment to ensuring anonymity, reports can be raised via a dedicated and confidential whistleblowing email address:- concerns@uwsglobal.net

3.b How we will respond to the concern

UWS is committed to responding to each concern raised appropriately, a further investigation into the matter may be relevant.

The person who has been told of the whistleblowing concern, should arrange to convey the issue to a member of the Global Management Team, usually the Chief Executive, unless that person, or a member of their team, has been identified in the allegation. In that case the Chair of the Board would need to be informed and investigate. All enquiries must be undertaken in the strictest confidence.

- If the report of concern involves a member of the Global Management Team, the UWS Chair of the Board should also be advised, who will need to nominate a Trustee from the Board with relevant knowledge or experience to carry out the investigation.
- Should the report of concern involve work practices within Finance, the Chair should be informed and the Chair of the Audit and Risk Committee asked to undertake the investigation.
- If a Director wishes to raise a concern, they should do this to the Chair of the Board, or if it is more appropriate to the Charity Commission. Where the Chair has been informed, he/she will decide who is best placed to investigate, particularly whether it should be an external organisation. The procedure in principle as above would still be followed and the Director would be informed of the outcome of the investigation and what action, if any, had been taken.

At the conclusion of the investigation, the person who reported the concern, will be informed of the outcome and what action, if any has been taken, so long as the relevant contact details were provided. This should be done formally in writing.

If the person who made the report or raised the concern remains unsatisfied about the speed or conduct of the investigation, or in the way in which the matter has been resolved, they can refer the matter to the Chief Executive. Where the investigation was completed by a Director, the matter should be referred to the Chair of the Board. Following further investigation of the complaint, they will be informed of the result and what, if any, action has been taken.

3.c How you are protected if you raise a concern

(i) Assurance

UWS recognises how uncomfortable or worrying it can be to raise a concern. UWS can assure all persons that the policy is designed to ensure anyone is able to raise a concern, free from harassment, dismissal or victimisation, as a result of their reporting.

UWS ensures that no Employee or Volunteer who raises a concern following this procedure will be treated in a detrimental way as a result, in accordance with section 47b of the Employment Rights Act 1996.

If any Employee, Director or Volunteer considers that they are being treated unfairly by anyone within UWS as a result, they must contact the Chief Executive or Chairman of the Board immediately and action will be taken to protect them from any reprisals.

However, if it becomes clear that the procedure has not been used in good faith and in the interest of the public (for example maliciously or to pursue a grudge), it may constitute misconduct and lead to disciplinary action.

There may be other cases of concern raised that pertain to Personal Grievances, if this is the case, UWS encourages Employees and Volunteers to refer to the UWS Employee Handbook (available for internal use).

(ii) Confidentiality

UWS will treat all disclosures in a confidential and sensitive manner. Providing it is not relevant for the investigation, the identity of the person reporting a concern will be kept confidential, however if this is required for the investigation, the identity will be shared only with relevant parties. All data will be stored according to our UWS Data Protection Policy, compliant with UK GDPR Law and guidance.

UWS recognises that there could be some matters which cannot be dealt with internally, if so external authorities would be asked to become involved. In these circumstances, UWS may make the referral without discussion or gaining the consent of the person who raised the concern. Following investigation, the person who raised the concern would be advised of the outcome.

See Appendix 1- Whistleblowing Flowchart for further information.

4. How to take the matter further

If you would like independent advice at any stage, or are with unsatisfied with the speed, conduct or way in which the matter was handled, you may contact the independent Charity, Public Concern at Work for free, independent whistleblowing advice, details below:

- Public Concern at Work- Tel: **020 3117 2520/** website: <https://protect-advice.org.uk/>

You may also contact The Charity Commission to raise your concern, make a whistleblowing report or seek external and independent advice.

- Charity Commission- Tel: 0300 066 9197/ website <https://www.gov.uk/government/organisations/charity-commission>

5. Roles and Responsibilities

UWS Trustees, Directors and Country Directors are responsible for the overall implementation of this Policy, including relevant compliance actions required. It is the responsibility of any Director or Manager who receives a Whistleblowing concern or report, to uphold this policy and follow the procedure outlined.

UWS Leadership with the support of the Programmes and Operations Team are responsible for ensuring effective and inclusive Policy Communication and Training in all implementing regions.

UWS Stakeholders are responsible for upholding this policy at all times. If any UWS Stakeholder receives a cause for concern or Whistleblowing report, it is their responsibility to report this to their Line Manager confidentiality and immediately. As per the UWS Whistleblowing procedure, the Line Manager will raise this concern and the relevant investigation will take place.

6. Policy Communication and Training

UWS is committed to ensuring that this policy and procedure is embedded across the organisation in the UK and all implementing countries, through effective and appropriate training to all key UWS Stakeholders, which includes refresher training provided on a continuous basis.

As part of our commitment to Equality, Diversity and Inclusion, we are committed to communicating this Policy across all implementing countries, methods include ensuring simplified policy versions are available in local languages and community level training is provided in a relevant manner.

This policy is publicly available via the UWS Website and accessible to all Employees and Volunteers on central information systems and as part of mandatory Induction training for all new starters.

7. Policy Attestation

UWS Stakeholders, referred to as UWS Trustees, Employees and Volunteers in the UK and all implementing countries are required to read this Policy on an annual basis and sign the policy accepting the terms and commitment to uphold this policy. Refresher or additional training may be offered.

8. Policy Review

This policy will be reviewed at intervals of 2 years by the Board of Trustees and Chief Executive or as/ when there are changes in legislation. This is to ensure this policy remains compliant with the law.

9. Important Contact Details

- Chief Executive- Graeme Hodge – graeme@uwsglobal.net
- Chair of Trustees- Peter Taylor- peter@uwsglobal.net

You may also contact us via our dedicated and confidential whistleblowing email address:- concerns@uwsglobal.net

The address for correspondence is: United World Schools, 133 Whitechapel High Street, London, E1 7QA, United Kingdom

For Community Level reporting in UWS implementing countries, the contact details of the Education Officer can be found at any UWS School.

These contact details will be updated upon any personnel changes.

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Appendix 1- UWS Whistleblowing Reporting Flowchart

