

## Whistle-blowing Policy

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Approved by:

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# Whistle-blowing Policy

## 1. Introduction

As an employee of ISB, it is most likely you will be one of the first to realise that there may be something seriously wrong within the organisation. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may also fear harassment or victimisation and think it may be easier to ignore the concern rather than report it. This Whistle-blowing Policy is intended to encourage and enable staff of ISB, to raise serious concerns within the organisation rather than overlooking a problem or discussing it externally.

## 2. Safeguards and Confidentiality

At ISB we recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. ISB will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith. Where feasible, you will be contacted when your concern has been investigated to ascertain whether you have suffered any detriment as a result of your whistleblowing. If at any time, either during or after the investigation, you feel that you have suffered any detriment as a result of your whistleblowing you should contact your senior managers.

ISB treats the details of all whistleblowers in confidence and will do our best to not divulge your identity. However, it must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

## 3. Allegations

- a. **Anonymous Allegations** - Anonymous allegations will be considered wherever possible at the discretion of ISB. The factors to be considered when determining whether an investigation in such a case can proceed would include:
  - A. The seriousness of the issues raised
  - B. The credibility of the concern
  - C. The likelihood of confirming the allegation from other, attributable sources
  
- b. **Untrue Allegations** - If you make an allegation with good intent, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, appropriate action may be taken against you by ISB.

## Main Legislative and National Guidance

- I. Public Interest Disclosure Act (1998)
- II. Data Protection Act (1998)

## Whistle-blowing Policy

- III. Freedom of Information Act (2000)
- IV. Employment legislation
- V. Employment policies

### 4. Procedures - How to raise a concern?

The earlier a concern is expressed, the easier it is to act. As a first step ISB recommends raising concerns with your immediate line manager or other appropriate member of Shura. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should contact the Chair/Vice Chair of the Shura. Concerns are best raised in writing. The sort of information required to investigate an allegation are details of the background and history to the case, names, dates, places and, where possible, the reason why you are particularly concerned.

Although you are not expected to prove an allegation, you will need to demonstrate that there are sufficient grounds for your concern. There are special rules surrounding the gathering of evidence. Any attempt to gather evidence by people who are unfamiliar with these rules may adversely affect the outcome of the case as evidence has to be collected in accordance with current legislation. All referrals made will be treated in the strictest of confidence.

#### ISB Response

In order to protect individuals and ISB, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. Within ten working days of a concern being received, where appropriate, ISB will write to you:

- I. acknowledging that the concern has been received,
- II. indicating how it proposes to deal with the matter,
- III. telling you whether any initial enquiries have been made.
- IV. telling you whether further investigations will take place and, if not, why not.

ISB will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, we will advise you about the procedure. ISB acknowledges the need to provide you with assurance that the matter has been properly addressed. Thus, subject to legal constraints, you will receive appropriate information about the extent and outcomes of any investigations.

#### How the matter can be taken further

This whistle-blowing policy is intended to provide an internal procedure through which concerns can be raised, and ISB hopes that anyone raising a concern will be

## Whistle-blowing Policy

satisfied with the action taken. Should you feel unable to raise a concern with your immediate manager, because the allegations relate to them, you should speak to Chair of the Shura. An employee should not take concerns directly to the media without first complying with this policy.

### 5. Support for Whistleblowers

All concerns raised under this procedure will be treated seriously. You will be kept informed about the progress of the investigation and the action which has been taken although you may not be told the outcome. In some cases, the investigation may result in criminal or disciplinary proceedings. Should you be invited to give a written statement or give evidence at a hearing, ISB will support you in this process and ensure that you are clear about what will happen. ISB will not tolerate harassment or victimisation and will take action to protect you if you have raised a concern in good faith. Any employee who is found to have victimised or harassed an employee who has raised a concern will face disciplinary action.

### 6. Roles and Responsibilities

- a. **ISB - has the overall responsibility for**
  - A. Maintaining and operating the policy
  - B. Annual review of the policy
  - C. Annual report on the effectiveness of the policy
  - D. Approving amendments to the policy
  - E. Promoting the policy periodically
  - F. Maintaining a record of concerns raised and the outcomes
- b. **Management Committee / Project Leaders**
  - A. To undertake investigations without undue delay
  - B. To maintain confidentiality
- c. **Staff/Teachers**
  - A. To raise concerns responsibly, in accordance with this procedure
- d. **Others**
  - A. As an employee of a contractor of ISB or a partner organisation, you may have concerns which you may want to bring to our attention. We are committed to encouraging all individuals, including non-madrassah staff to raise serious concerns with the organisation. Whilst we would seek always to protect the anonymity of individuals raising concerns in good faith, the Whistle blowing Policy does not protect employees of external organisations in the same way as ISB employees.

### 7. Equality Impact Assessment

The equality impact assessment of this policy is wholly positive as the policy supports the opportunity to address equality and diversity issues.