Learners Today.. Leaders Tomorrow

The Gulf English School

Whole School Whistleblowing Policy

Author: Leadership Team

Adoption / Review	Committee	Lead Personnel	Review Date:
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This policy applies across all campuses:
GES Gharafa (Infants, Juniors, and Secondary)
GES Bin Omran

Responsible, **R**espectful, **R**esilience

The Gulf English School's

Our Vision

We aim to develop a responsible, respectful, resilient school community, supporting the highest level of personal achievement in a changing modern intercultural world.

V1	We aim to develop a responsible, respectful, resilient school community,
V2	supporting the highest level of personal achievement
V3	in a changing modern intercultural world.

Mission Statements

M1	We provide a high-quality education, focusing on skills, knowledge and application, enabling our community to strive and achieve excellence
M2	We aim to develop a culture of life-long learning, independence, ambition, which is continuously demonstrated by our community.
M3	Our community promotes diversity and global citizenship where individual differences are understood and celebrated.
M4	To drive the development of creative skills and critical awareness in our students.
M5	Our school community provides a safe, supportive, and stimulating learning environment that focusses on the well-being of all
M6	We aim to integrate the use of technology on a day-to-day basis to enhance our teaching and learning.

Our Core Values: The 3 R's

- ✓ **Responsible:** Driven, Ambitious, Achiever
- ✓ **Respectful:** Empathy, supportive, caring, diversity
- ✓ **Resilient:** Risk takers, empowered, committed

Whole School Whistleblowing Policy

This policy provides a safe and clear route for members of The Gulf English School community to report serious concerns about wrongdoing, risk, malpractice or failures in safeguarding. GES will take genuine concerns seriously, examine them fairly and protect people who raise them honestly and responsibly from retaliation.

1 Purpose and principles

The Gulf English School is committed to an open, responsible and respectful culture in which concerns can be raised without fear. Speaking up at an early stage allows the school to protect students, staff and the wider community, correct wrongdoing and maintain public confidence.

The school will:

- provide accessible internal reporting routes, including an alternative route where a senior leader is involved;
- respond promptly, impartially and proportionately;
- treat information sensitively and share it only with those who need it;
- protect a person who raises a concern in good faith from victimisation, disadvantage or retaliation;
- keep appropriate records and act on substantiated concerns; and
- comply with applicable laws, Ministry of Education and Higher Education requirements, safeguarding obligations and lawful directions from the competent authorities in Qatar.

2 Scope

This policy applies across GES Gharafa, including Infants, Juniors and Secondary, and GES Bin Omran. It applies to employees, agency, contractors, consultants, volunteers, governors or Board members, trainees and others working for or on behalf of the school. Former workers may also use it to report concerns arising from their work at GES.

Students and parents may raise concerns through the school safeguarding or complaints procedures. Where their information concerns serious wrongdoing by an adult or the school, GES may manage it under this policy.

3 What is whistleblowing

Whistleblowing is the reporting of information which a person reasonably believes shows serious wrongdoing, danger, malpractice or concealment. The concern will normally affect students, colleagues, the school or the wider public rather than being solely a personal employment matter.

Examples include:

- a safeguarding or child protection concern, including unsafe practice, abuse, exploitation, grooming or a failure to follow safeguarding procedures;
- conduct that may constitute a criminal offence or breach of law;
- fraud, theft, bribery, corruption, financial irregularity or misuse of school funds or property;
- serious breaches of health and safety, or deliberate disregard of a risk to students, staff or visitors;
- serious professional misconduct, abuse of authority, discrimination, harassment or unethical behaviour;

- deliberate falsification, suppression or improper alteration of records, results, attendance, qualifications, recruitment checks or regulatory evidence;
- a serious breach of data protection, confidentiality, examination security or cybersecurity;
- environmental damage, serious regulatory non-compliance or conduct likely to bring the school into serious disrepute; and
- deliberate concealment of any of the above.

This list is illustrative. A person does not need proof before raising a concern; a reasonable and honest belief, supported by the information available to them, is sufficient.

4 Matters dealt with under other procedures

A personal complaint about an individual employee's contract, pay, workload, appraisal, relationships or treatment will normally be addressed through the Grievance Procedure. Complaints from parents or students will normally follow the Complaints Policy. Conduct or performance concerns may be addressed through disciplinary, capability or other employment procedures. The school may decide which procedure, or combination of procedures, is most appropriate after reviewing the substance of the concern.

Whistleblowing should not be used to bypass ordinary management discussions or to pursue a personal disagreement. However, a concern must not be rejected merely because it also affects the person raising it.

5 Safeguarding and immediate danger

The safety and welfare of children takes priority. A concern that a child is at immediate risk must be reported without delay to the Designated Safeguarding Lead or another member of the safeguarding team and dealt with under the Safeguarding and Child Protection Policy. If the concern involves the Designated Safeguarding Lead, it must be reported to the Head of School. If it concerns the Head of School or another person in that reporting route, it must be reported directly to the General Manager or the designated Board member.

Where there is an immediate threat to life, safety or security, the person should contact the appropriate emergency service or competent authority and then inform the school as soon as it is safe to do so. A safeguarding concern must never be delayed while evidence is gathered or because the normal contact is unavailable.

6 How to raise a concern

Concerns should normally be raised as soon as possible. They may be reported verbally or in writing. A written report is helpful but is not required. The person should provide, as far as they can:

- the nature of the concern and why it is believed to be serious;
- relevant dates, locations and names or roles;
- what was witnessed or how the information became known;
- any supporting records or evidence already lawfully available;
- whether anyone may be at immediate risk; and
- whether the concern has previously been raised and what happened.

Staff must not investigate the matter themselves, question students or witnesses unnecessarily, access records without authority, record private conversations unlawfully, or remove confidential documents. Relevant information should be preserved and passed securely to the person receiving the concern.

7 Reporting routes

Situation	Report to
Most concerns	The employee's line manager or the relevant section Head.
Safeguarding or child protection	The Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead, in accordance with the Safeguarding and Child Protection Policy.
Concern involves the normal recipient, or the reporter believes that route is inappropriate	The Head of School or General Manager.
Concern involves the Head of School or General Manager, or could not reasonably be handled by them	The designated Board member or Chair of the Board.
Immediate danger or suspected serious criminal conduct	The appropriate emergency service or competent authority, followed by notification to an appropriate senior school contact when safe and lawful.

A concern received by the wrong person must be passed promptly and securely to the appropriate recipient. No one implicated in a concern will lead or control the investigation into it.

8 Anonymous concerns

GES encourages people to identify themselves because this makes it easier to clarify information, assess credibility, provide protection and communicate an outcome. Anonymous concerns will nevertheless be considered. The school will assess their seriousness, specificity, credibility, supporting information and the feasibility of a fair investigation. Anonymity may limit the action or feedback possible.

9 Confidentiality

The identity of the person raising a concern will be kept confidential as far as reasonably possible. It will be disclosed only where this is necessary to assess or investigate the concern, protect a child or another person, ensure a fair process, comply with law or a lawful direction, or take formal action. Absolute confidentiality cannot therefore be guaranteed. Where practicable, the school will discuss any necessary disclosure with the person first.

Everyone involved must respect the confidentiality of the process. This does not prevent a person from obtaining confidential advice or making a lawful report to a competent authority, but information about students, staff and the investigation must not be shared casually, published, posted online or discussed with people who have no legitimate role.

10 Protection from retaliation

GES will not tolerate dismissal, disciplinary action, threats, intimidation, bullying, exclusion, unfair treatment, loss of opportunity or any other retaliation because a person raised a genuine concern or participated honestly in an investigation. Any suspected retaliation must be reported immediately and may result in disciplinary action.

Protection applies where the person has an honest and reasonable belief in the concern, even if it is not substantiated. It does not protect a person from the consequences of their own misconduct disclosed through the report, although cooperation may be taken into account.

11 Knowingly false or malicious reports

A concern raised honestly will not lead to disciplinary action merely because it is mistaken or unsubstantiated. Knowingly making a false allegation, fabricating evidence, acting maliciously or using this procedure to harass another person is a serious matter and may be addressed under the relevant disciplinary or conduct procedure. A finding that a concern was not substantiated does not, by itself, mean that it was malicious.

12 Initial response and assessment

The recipient will acknowledge the concern as soon as reasonably practicable, normally within five working days where contact details are available. Urgent safeguarding or safety concerns will be acted upon immediately. The recipient will make an initial assessment to determine:

- whether immediate protective action is needed;
- which policy, authority or decision-maker has responsibility;
- whether the matter can be reviewed internally and who is sufficiently independent;
- whether specialist, legal, safeguarding, audit or external advice is required;
- whether evidence must be secured and access restricted; and
- what information can safely be shared with the person raising the concern.

The initial assessment is not a decision that the allegation is true. The school will avoid conflicts of interest and will consider appointing an independent investigator for serious, complex or senior-level concerns.

13 Investigation

Any investigation will be proportionate, impartial, timely and documented. Terms of reference may be set for complex matters. The investigator may review records, interview relevant people, obtain specialist advice and recommend interim measures to protect individuals or the integrity of the process. Interim measures are precautionary and do not imply guilt.

The subject of a concern will be treated fairly and will normally be informed of the substance of allegations and given a reasonable opportunity to respond, unless doing so at that stage would place someone at risk, prejudice evidence, breach a lawful requirement or obstruct a safeguarding or external investigation. All participants are expected to cooperate honestly and preserve relevant information.

The school may pause, limit or transfer its investigation where police, the Ministry, a regulator, an examination board, a safeguarding authority or another competent body is involved.

14 Outcome and feedback

Following review or investigation, the school will decide what action is required. This may include no further action, corrective or protective measures, changes to systems or training, referral under another school procedure, disciplinary action, notification to an examination board or regulator, or referral to a competent authority.

Where possible, the person who raised the concern will be told when the process has concluded and given a general indication of the outcome. The school may be unable to disclose detailed findings, personal data, safeguarding information or disciplinary action relating to another person. The person raising the concern must respect those limits.

15 If the person believes the response is inadequate

If the person reasonably believes the concern has not been addressed appropriately, they should explain why to the next level in the reporting routes above and provide any new or overlooked information. The senior recipient will review the handling of the concern and decide whether further action or an independent review is required.

Nothing in this policy prevents a person from making a lawful report to the Ministry of Education and Higher Education, the police, emergency services, a regulator, examination board or another competent authority. Anyone considering external disclosure should act responsibly, protect confidential student and personal information, and consider obtaining independent legal advice. Media or social-media disclosure will rarely be an appropriate first step and may cause harm or breach legal and professional duties.

16 Support

A person raising a concern may seek confidential support from an appropriate colleague, recognised representative or independent adviser. They may be accompanied by a workplace colleague at a formal meeting, provided that the companion maintains confidentiality and is not involved in the matter. The school will also consider reasonable wellbeing support for the reporter, witnesses and the person who is the subject of the concern.

17 Records and data protection

The school will keep a secure record of the concern, risk assessment, decisions, investigation steps, evidence and outcome. Access will be restricted to those with a legitimate need. Records will be retained and disposed of in accordance with applicable legal requirements and the school's retention and data protection arrangements. Safeguarding records will be managed separately in accordance with safeguarding procedures.

18 Roles and responsibilities

All staff and workers: raise serious concerns promptly, cooperate honestly, protect confidentiality and preserve relevant information.

Line managers and section leaders: listen without prejudging, identify urgent risk, record the concern accurately and refer it through the correct route.

Designated Safeguarding Lead: ensures that child protection concerns are acted on immediately and in accordance with the Safeguarding and Child Protection Policy.

Head of School and General Manager: ensure appropriate oversight, independence, resources, protective action and communication.

Board: provides an independent escalation route for concerns involving senior leadership and receives appropriate assurance about the effectiveness of the procedure.

Investigator: acts impartially, declares conflicts of interest, maintains secure records and reports evidence-based findings.

19 Monitoring and review

The Leadership Team will review this policy at least annually and sooner following a significant case, change in law or regulatory expectation, or evidence that the procedure is not operating effectively. An anonymised overview of significant concerns, themes, actions and any retaliation allegations may be reported to the Board. No monitoring report should identify students or individuals unnecessarily.

20 Related policies and procedures

- Safeguarding and Child Protection Policy
- Staff Code of Conduct and Ways of Working
- Complaints Policy
- Grievance Procedure
- Disciplinary Procedure
- Anti-Bullying, Equality and Dignity at Work arrangements
- Health and Safety Policy
- Data Protection, Confidentiality and Records Retention arrangements
- Safer Recruitment Policy
- Examinations and Assessment policies

21 Policy status

This policy is an internal GES procedure. It is intended to support lawful and responsible reporting but does not create a contractual entitlement or replace applicable law, safeguarding duties, employment procedures or the authority of the Ministry of Education and Higher Education and other competent bodies in Qatar.