



**BLOOM WORLD
ACADEMY**

Reference Number

BWA-22

Whistleblowing Policy	
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Owner	Nicola Upham, Principal – Primo & Junior School and Well-being & Development (Whole School)
Reviewer	John Bell, Executive Principal 



BLOOM WORLD ACADEMY

Policy Aim

Bloom World Academy (BWA) considers this policy to be:

- An essential part of the school
- Supportive to staff and students in managing certain situations
- An important framework that will ensure consistency in applying values and principles throughout the establishment
- A roadmap for day-to-day operations
- Compliant with laws and regulations, offering guidance for decision-making and streamlining internal processes
- Designed to influence and determine all major decisions, actions, and all activities taking place within defined boundaries
- Aligned to the school's guiding statements and strategic goals determined during leadership meetings

Statement of Intent

BWA believes this policy to be a living, working document that reflects our ethos, mission, and vision. It promotes consistency and high standards across the school and is aligned with current UAE legislation and educational best practice.

Scope

This policy applies to:

- All BWA employees (teaching and non-teaching)
- Leadership and administrative teams
- Contractors and self-employed individuals working at BWA
- Agency workers
- Volunteers
- Consultants providing services to the school
- Trainee or student teachers
- External service providers on campus

Students should use the appropriate safeguarding, student concerns or complaints route rather than this staff whistleblowing procedure.

Definitions

- Whistleblowing: Reporting suspected wrongdoing that is in the public interest.



BLOOM WORLD ACADEMY

- Whistle-blower: A person who raises a genuine concern relating to wrongdoing.
- Malicious/Vexatious Allegation: A knowingly false or misleading report intended to harm or discredit.
- Grievance: A personal concern or dissatisfaction related to an individual's employment situation that does not qualify as whistleblowing.

Purpose of This Policy

This policy aims to:

- Encourage individuals to report wrongdoing in the knowledge that their concerns will be taken seriously and treated confidentially
- Establish procedures for reporting and investigating concerns
- Reassure staff they will not suffer victimisation or disadvantage for raising concerns in good faith
- Distinguish between whistleblowing and personal grievances
- Outline protections and responsibilities for those reporting concerns

What Qualifies as Whistleblowing?

Concerns that may be considered whistleblowing include but are not limited to:

- Criminal offences (e.g., fraud, corruption)
- Health and safety risks to students, staff, or visitors
- Failure to comply with legal obligations
- Environmental harm
- Misuse of school or educational trust funds
- Breaches of financial regulations
- Discrimination, abuse, or unethical practices
- Attempts to conceal any of the above

Confidential Reporting and Employee Protection

BWA, in line with Bloom Education, is committed to openness, accountability, and integrity. Employees are encouraged to report concerns without fear of retaliation.

We assure that:

- All concerns will be taken seriously and investigated
- Whistle-blowers will be protected against harassment or victimization
- Identity will be kept confidential whenever possible



BLOOM WORLD ACADEMY

- Anonymous allegations may be considered if they relate to child welfare or serious misconduct

If a concern involves the immediate safety or welfare of a child, follow the Safeguarding Policy immediately. Do not delay reporting while considering whether the matter meets the definition of whistleblowing.

Procedure for Making an Allegation

1. **Reporting the Concern:** Any individual who wishes to raise a concern should report the matter in writing or verbally to one of the following:
 - Executive Principal
 - Senior or Primo/Junior Principal
 - Human Resources
 - Designated Safeguarding Lead (DSL) where the concern relates to child safety or protection
 - Chief Executive Officer (CEO) Bloom Education if the concern involves the Executive Principal or if the individual does not feel able to raise the concern through the school.

In circumstances where written communication is not feasible, verbal concerns may also be raised.

If the concern involves or could reasonably be perceived to involve, the person who would normally receive or investigate the concern, it should be reported to an alternative appropriate person from the list above.

2. **Initial Response Within Five Working Days:** Within five working days of receiving the allegation, the individual who reported the concern will receive an acknowledgment of their submission. The response will include a clarification of how the concern will be addressed, an outline of the steps involved, and an estimated timeline for the investigation. In addition, appropriate support will be offered to the whistle-blower throughout the process.
3. **Investigation Process and Timeline:** BWA will aim to progress investigations promptly. The timeframe will depend on the nature and complexity of the concern. The whistle-blower will be kept informed of progress and any significant changes to the anticipated timescale.

During any meetings related to the inquiry, the whistle-blower has the right to be accompanied by a professional colleague for support. A final report will be compiled at the conclusion of the investigation.

4. **Reporting the Outcome:** Once the investigation is complete, the whistle-blower will be informed of the outcome in writing. The report will include findings, conclusions, and any recommended actions, subject to confidentiality, legal and safeguarding requirements. The



BLOOM WORLD ACADEMY

identity of the whistle-blower will not be disclosed in the report unless disclosure is required by law or necessary for the investigation.

Nothing in this policy prevents an individual from making a report to a competent authority where this is required or permitted by law.

Employee Grievance Process (If Not Whistleblowing)

If the concern is personal or contractual, follow the Grievance Procedure:

1. Raise it with the Direct Line Manager/Principal
2. If unresolved, submit a written complaint to the Executive Principal
3. If still unresolved, escalate to the HR Department
4. If dissatisfaction remains, HR may escalate to senior leadership/CEO

Responses will be provided at each stage within three working days.

Right to Appeal: If the individual who raised the allegation is dissatisfied with the outcome of the investigation or the actions taken, they have the right to appeal the decision. The appeal must be submitted in writing within five working days of receiving the final outcome. The appeal should clearly state the grounds for dissatisfaction and include any additional evidence or context that may not have been considered during the initial investigation. The appeal will be reviewed by a designated senior leader not previously involved in the case. A response to the appeal will be provided within ten working days, and this decision will be considered final.

5. Processing and practice

The following principles apply to the handling of whistleblowing concerns:

- Consistency, fairness and impartiality in assessing and investigating concerns.
- Prompt action proportionate to the seriousness and potential risk of the concern.
- Confidential handling and secure record keeping.
- Appropriate support for the whistle-blower and protection from retaliation.
- Independent handling where a conflict of interest exists or could reasonably be perceived.

Roles and Responsibilities

With regard to implementation of this policy, roles and responsibilities are clearly stated below:

Role of the Executive Principal

- Receive or arrange the appropriate receipt of whistleblowing concerns.
- Ensure concerns are assessed and escalated appropriately.



BLOOM WORLD ACADEMY

- Ensure that investigations are conducted fairly and, where necessary, independently.
- Ensure appropriate actions are taken following an investigation.
- Ensure records are maintained securely and shared only with those who have a legitimate need to know.

Role of School Personnel

It is the responsibility of the teachers and staff to:

- Raise genuine concerns promptly through the appropriate reporting route.
- Maintain confidentiality and avoid discussing concerns with individuals who do not need to know.
- Co-operate honestly with any investigation.
- Report any suspected retaliation or victimisation arising from whistleblowing.

Independence and Conflicts of Interest

Any person involved in receiving, assessing or investigating a concern must declare any actual, potential or perceived conflict of interest. Where appropriate, the investigation will be allocated to an independent person who has not been involved in the matter.

Confidentiality and Record Keeping

BWA will make every reasonable effort to maintain confidentiality. Information will only be shared with those who need it to assess, investigate or respond to the concern, or where disclosure is required or permitted by law. Whistleblowing concerns, decisions, investigations and outcomes will be recorded securely in accordance with BWA/Bloom Education information governance and retention requirements.

Every effort will be made to protect confidentiality. However, during investigations, it may become necessary to identify the whistle-blower, especially in legal proceedings.

False or Malicious Allegations

Allegations made in good faith will not result in disciplinary action, even if unproven. However, knowingly false or malicious allegations may lead to disciplinary consequences, including dismissal.

Whistleblowing and Child Protection

Any concerns relating to child safety or protection must be reported immediately to the Designated Safeguarding Lead (DSL) or the Executive Principal, following the Child Protection and Safeguarding Policy.

Where a concern involves an immediate risk to a child, safeguarding procedures take precedence over this whistleblowing procedure.



BLOOM WORLD ACADEMY

Staff must follow the school's safeguarding reporting arrangements and must not delay reporting while considering whether a concern meets the definition of whistleblowing.

Safeguard Against Reprisal

BWA will take disciplinary action against any employee who harasses, victimises or otherwise retaliates against someone for raising a concern in good faith.

Monitoring and Review

This policy will be reviewed annually or as needed to reflect legal or procedural changes and ensure alignment with strategic objectives.

Contact Points for Raising Concerns

- Executive Principal
- Principal
- HR Department
- Designated Safeguarding Lead (for child protection)
- CEO, Bloom Education (if concern is about senior leadership or cannot appropriately be raised through the school)

Associated Documentation

When implementing a policy, consideration must be given to how it aligns and supports other policies. To ensure consistency this policy is fully aligned with the following key policies:

Safeguarding
Complaints policy
Grievance Procedure

6. Training implications

This policy will be shared with all staff annually through the staff handbook and policy review process. Key reporting routes will be reinforced through safeguarding induction and annual safeguarding training. Leaders and HR will receive additional guidance on receiving and escalating whistleblowing concerns.

The policy will be revisited following any significant legislative, safeguarding or procedural change and as part of the annual policy review.



BLOOM WORLD ACADEMY

7. Safeguarding

We are committed to safeguarding and promoting the welfare of all children as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all children.

We believe that all children have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and learning, pastoral support and care for both pupils and school personnel, training for school personnel and with working with parents. We teach all our children about safeguarding.

We work hard to ensure that everyone keeps careful watch throughout the school and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.

8. Equity Impact Assessment

We have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief.

This policy has been equality impact assessed and we believe that it is fair, it does not prioritise or disadvantage any member of staff or student and it helps to promote equality at this school.