

INDEPENDENT SCHOOLS INSPECTORATE

WHISTLEBLOWING POLICY

DATE OF POLICY:	October 2024
POLICY OWNER	Chief Executive Officer – Chief Inspector
APPROVED BY:	ISI Board
DATE OF NEXT REVIEW:	October 2025

Introduction

1. ISI is committed to high quality inspection, promoting improvement in all settings. Concerns about poor practice within ISI, including poor inspection practice, illegal practice or other wrongdoing, may be raised without fear of detriment with the Chief Executive Officer-Chief Inspector (CEO-CI), or via the ISI whistleblowing policy.
2. The Directors and staff of ISI operate all aspects of the ISI's activities with full regard to high standards of conduct and integrity. Any suspected wrongdoing should be reported as soon as possible.
3. In accordance with the [guidance for independent school inspectorates](#), the CEO-CI's terms of appointment include a provision for the CEO-CI to inform the Department for Education (DfE) confidentially of any instances where the CEO-CI feels that undue pressure is being brought to bear to influence inspection judgements.
4. In accordance with the DfE's letter of appointment of ISI as an inspectorate (dated 29 March 2023), *no association shall seek to influence the conduct of any ISI inspection, including the composition of the inspection team and the conclusions of the inspectors. Any attempt at undue influence shall be promptly reported by the Chief Inspector of ISI to the Chair of the Board of Directors of ISI, and the actions taken in response to any such complaint shall be reported to DfE.*

Application and purpose

5. This policy applies to all employees, inspectors, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (referred to as 'you' throughout this policy).
6. The policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the organisation without fear of victimisation, subsequent discrimination, disadvantage or dismissal.
7. This policy is intended to encourage and enable you to raise serious concerns in the first instance within the organisation, rather than ignoring a problem or 'blowing the whistle' outside the organisation.
8. This policy does not form part of any employee's contract of employment and may be amended from time to time.
9. This policy is not intended to be used in place of raising general concerns about your treatment at work. In such cases, the Grievance and Resolution Policy is the most appropriate process to attempt to resolve a dispute.
10. ISI's inspectors and employees are aware of the existing policies and procedures for inspection and the independent safeguards which are already in place. These include:
 - internal monitoring and quality assurance;
 - Ofsted quality assurance monitoring;
 - complaints procedures covering both inspection and non-inspection complaints;
 - the ISI safeguarding policy.

11. Concerns should be raised via this policy if you are satisfied that the following criteria are met:

- you are acting in good faith
- you have reasonable grounds to believe the information disclosed indicates that any of the following has happened, is in progress or is likely to happen:
 - poor inspection practice undermining the integrity of an inspection (*refer to ISI's Complaints Policy for details about how to complain about an individual inspection*).
 - failure to comply with the necessary requirements for the inspectorate to maintain approval by the Secretary of State for Education;
 - criminal offence(s);
 - failure to comply with legal obligation(s);
 - miscarriage(s) of justice;
 - endangerment of health and safety;
 - damage to the environment;
 - concealment of information about any of the above;
 - concerns about the Safeguarding of Children under [Keeping children safe in education](#);
 - unethical conduct which does not uphold the values of the ISI.
- you are not disclosing the information for personal gain and you seriously believe the concern to be valid and that the disclosure is in the public interest .

Protection from detriment having raised a concern

12. This policy sets out the procedures that you should follow if you are concerned about any matter falling under 11 above, whether or not directly related to inspection. You should be assured that raising genuine concerns will not result in reprisals in any form.
13. Victimisation of those raising concerns will not be tolerated and we will take appropriate action to protect any person who raises a concern in the appropriate manner using this policy. This will still be the case, even where a concern that is sincerely felt and expressed is subsequently unsubstantiated or proved to be unfounded.

Confidentiality

14. We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity confidential and only reveal it where necessary to those involved in investigating your concern. However, any investigation process itself may reveal the source of the information and a statement may be necessary as part of the evidence.

How to raise a concern

15. We hope that in many cases, you will be able to raise any concerns with your line manager. However, where you prefer not to raise it with your line manager for any reason, you should contact the CEO-CI, the Chair of the Board, or another named member of the Board. Contact details are at the end of this policy.

How ISI will respond to whistle-blowing concerns about ISI

16. ISI may investigate the matters raised by one or more of the following means, as appropriate:
 - Internal investigation by the relevant line manager or another manager.
 - Investigation by or on behalf of the CEO-CI, with benefit of external advice where appropriate.
 - Investigation by or on behalf of the Chair of the ISI Board (or named Board member), with benefit of external advice where appropriate.
 - Referral for external investigation by the relevant government agency, independent person or organisation sufficiently experienced in carrying out investigations.
17. Certain matters may be subject to investigation by the Police, if there is evidence to suggest that a criminal offence may have occurred, or may be about to occur. In the event of a serious child protection matter, the relevant Local Authority will be informed by ISI (see the ISI [Safeguarding policy](#) on the ISI website for more information).

External disclosures

18. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
19. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Further guidance can be found on the Government's website [whistleblowing for employees](#) or via [Protect](#), a Whistleblowing Charity who operate a confidential helpline. Their contact details are at the end of this policy.

Protection and support for whistleblowers

20. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistleblowers are not required to establish proof of their concerns, but it will be necessary to demonstrate that there are sufficient grounds for their concern.
21. Whistleblowers may, if they wish, be accompanied by a colleague or Trade Union representatives if invited to meetings to discuss their concerns.
22. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the CEO-CI immediately or, if the issue involves the CEO-CI, the Chair of the Board or, if the issue involves the Chair of the Board, a named Board member (details provided below).
23. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.
24. If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Contacts

CEO-CI / Whistleblowing Officer	Vanessa Ward Email: vanessa.ward@isi.net Telephone 020 7600 0100
Chair	Pamela Chesters Email: pamela.chesters@isi.net Telephone 020 7600 0100
Board member	Simon Camby Email: simon.camby@isi.net Telephone 020 7600 0100
<p>Protect (formerly Public concern at Work) Independent Charity: Website: https://protect-advice.org.uk/ Webform: Contact our Advice Line - Protect - Speak up stop harm (protect-advice.org.uk) Address: The Green House, 244-254 Cambridge Heath Road, London E2 9DA Telephone: 020 3117 2520</p>	

Table of changes

Date	Paragraph	Amendment
October 2024	12	Correction to paragraph number
	Contacts	Updated reference to Protect's contact details (webform replaces email)
November 2023		Cover: changed policy owner to CEO-CI
	3 and 4	New paragraphs
	9	Changed reference to 'grievance <i>and resolution</i> ' policy
	11	Updated link to Keeping Children Safe in Education 2023
		Contacts: updated