

## Whistleblowing Policy 2024-25

The English College is committed to ensuring that any allegations of malpractice within the organisation are taken seriously. Employees are asked to bring any such allegations to the College's immediate attention. This is in the interests of the College, its pupils, its staff, and the public. This policy sets out the ways in which employees should bring any concerns to the attention of the College, and explains how and in what circumstances to raise concerns outside the College to appropriate external bodies.

This policy takes into account the protection for employees, who bring matters of public interest to the attention of their employers or outside bodies, and reflects provisions in UK schools covered under the Public Interest Disclosure Act 1998.

### 1. Matters covered by this policy

Employees are asked to raise their concerns in accordance with this policy, about any of the following matters that they think are or may be taking place within the College:

- Fraud
- Child abuse
- Malpractice (e.g. financial irregularities, corruption, bribery, dishonesty)
- Commission of criminal offences
- Failure to comply with legal obligations
- Miscarriages of justice
- Dangers to health and safety
- Unethical conduct

This list is not intended to be exhaustive. Employees are asked to raise any other concerns which they may have about matters that they believe threaten the interests of the College, its pupils, its staff, or the public.

This procedure is not a substitute for the College's grievance procedure, and concerns about an employee's personal employment situation should be raised through the grievance procedure in the normal manner.

## 2. Procedure for bringing these concerns to the attention of a responsible person

Employees are welcome to raise concerns internally within the College in the first instance. If the employee is not satisfied that their concerns are being dealt with satisfactorily, the employee can then raise the issue with the Chairman of Governors, who may either deal with the matter himself or nominate another Governor to deal with the matter. If the person who has a concern is an employee and the area of concern relates to safeguarding, they are encouraged to consult with the safeguarding policy, which gives further guidance on what to do in that area of concern.

However, within the Czech legal framework there is a specific process and context in which whistleblowing takes place, which is called the Act on the Protection of Whistleblowers (Act. No. 171/2023 coll.). In accordance with Act No. 171/2023Coll., on the protection of whistleblowers (hereinafter referred to as the "Act on the Protection of Whistleblowers"), our school The English College in Prague - Anglické gymnázium, o.p.s. (hereinafter referred to as "ECP") (from September 1, 2023) has created an internal notification system and appointed the Designated Person responsible for receiving notifications - Headmaster Dr. Nigel Brown and HR Manager Anna Štrosová.

The Designated Person accepts and handles notifications submitted by an ECP employee or a person performing volunteer work, trainees or an internship at the ECP, i.e. a person who performs work or other similar activities for the ECP as a mandatory entity with reference to § 2 paragraph 3 letter a), b), h) or i) of the Act on the Protection of Whistleblowers (hereinafter referred to as "Whistleblower").

Anonymous notifications are not considered as reports and are not investigated by the Designated Person. The notifications could be submitted either :

■ in written form

1. in paper form through the postal service, stating the name of the Designated Person and marking the envelope "Confidential", to the address ECP, Sokolovská 320, 190 00 Prague
2. in paper form by handing it over directly to the Designated Person
3. by email [whistleblowing@ecp.cz](mailto:whistleblowing@ecp.cz)

■ or orally

1. by phone on 283 101 207
2. in person to Dr. Nigel Brown or Mgr. Anna Štrosová

The Whistleblower will be informed about the assessment result within 30 days of receipt of the notification, and in justified cases this period can be extended by another 30 days.

In accordance with § 2 of the Act on the Protection of Whistleblowers, the notification contains information about the name, surname and date of birth, or other information from which the identity of the whistleblower can be deduced. It also contains information about a possible illegal act that occurred or is expected to occur at ECP, or with a person with whom the whistleblower was or is in contact in connection with the performance of employment, volunteering, professional practice or internship at ECP and which:

1. has the crime characteristics,
2. has the characteristics of a misdemeanour for which the law stipulates a fine rate, the upper limit of which is at least CZK 100,000,
3. is breaking Act on the Protection of Whistleblowers or
4. is breaking another legal regulations or regulations of the European Union

In view of the circumstances and information available to him at the time of notification, the Whistleblower should have good reason to believe that the facts reported by him/her are authentic and true. It is therefore not possible to report knowingly false facts. Such behaviour may be sanctioned. The Whistleblower should be able to identify the area of the illegal act and think about what verifiable information they can provide about the reported illegal act.

The extent and quality of the information submitted can positively influence the way the notification is investigated. The external reporting system of the Ministry of Justice is intended for persons who report illegal acts unrelated to ECP activities: <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

### **3. Confidentiality**

Employees need to be sure that they can raise concerns about matters without fear of reprisals. The school will do its utmost within the context of the law to do this. The College will also take all reasonable steps to ensure that employees who have raised concerns under this procedure will not be victimised in any way by fellow employees or other members of the College. The College itself will not penalise employees in any way for raising concerns or making allegations in good faith in accordance with this procedure.

Victimisation or other unfavourable treatment of an employee, pupil or other member of the College because that person has raised concerns under this policy or in order to deter that person from raising such concerns will be treated as a serious disciplinary offence under the College's disciplinary procedure.

### **4. Abuse of this policy**

If an employee abuses this procedure in order to make false or malicious allegations, this will be treated as a serious disciplinary offence under the College's disciplinary procedure, which will be considered by the Headmaster and may result in disciplinary action being taken against the employee up to and including dismissal from employment.