



## **BCA Whistleblowing Policy**

### **Statement of Intent**

The British College of Andorra (BCA) is committed to fostering a culture of transparency, integrity, and responsibility, in line with the published BCA Values.

Whistleblowing is the act of reporting or exposing wrongdoing, illegal activity, or unethical behavior within an organization.

This policy provides a framework for staff, students, families, and other stakeholders to raise genuine concerns about suspected irregularities or misconduct, in a way that ensures protection from retaliation and complies with Andorran laws and international best practices.

This policy aims to:

- Enable individuals to report wrongdoing at an early stage without fear of reprisal.
- Clarify how concerns can be raised and how they will be handled.
- Comply with the legal obligations set out under Andorran labour law on data protection, and international norms.
- Protect the reputation, operations, and ethical standing of the school.

A separate BCA Complaints Policy is used to address concerns regarding school operations or the application of the school's written policies. The BCA Whistleblowing Policy is specifically designed for serious concerns related to unlawful activity, unethical practices, or misconduct.

## **Scope**

This policy applies to:

- All BCA employees (permanent, temporary, or contract)
- Volunteers and student teachers
- The school owner, British College Overseas SL and its appointed Administrator for the school.
- Consultants and service providers
- Students (age-appropriate), parents, and guardians

## **Policy Statement**

### **1. Types of Concerns**

Concerns that may be reported under this policy include, but are not limited to:

- Financial mismanagement, fraud, or corruption
- Breaches of safeguarding or child protection (please refer to BCA Safeguarding and Child Protection Policy)
- Academic malpractice or examination irregularities (please refer to BCA Academic Integrity Policy and BCA Examinations Policy)
- Breaches of health and safety laws (please refer to BCA Health and Safety Policy)
- Discrimination, harassment, or bullying (please refer to BCA Anti-Discrimination Statement and BCA Anti-Bullying Policy)
- Violations of data protection or privacy regulations
- Criminal activity or serious misconduct
- Attempts to cover up any of the above

Note: Personal employment grievances (e.g. salary disputes, interpersonal conflict) must be handled through the appropriate grievance or HR procedure unless there is a wider public interest.

### **2. Safeguarding-specific Concerns**

2.1 Child welfare concerns must be raised immediately with the BCA Designated Safeguarding Lead (DSL) or Deputy DSL, in accordance with BCA's Safeguarding and Child Protection Policy (which is fully aligned with Andorran child protection procedures).

2.2 Where there is an immediate risk to a child, contact the Andorran Police (Policia d'Andorra) or Social Services (Servei d'Atenció a la Infància) directly.

2.3 Any doubt or concern about an adult's suitability to work with children, and regardless of whether a breach of the BCA Safeguarding and Child Protection Policy has occurred, must be reported to the DSL, DDSL or Principal. Please also refer to section 3.3.2 of the above policy.

### **3. How to Raise a Concern**

Concerns can be raised confidentially with:

- (Employees) Your direct supervisor or line manager
- The Principal
- The Administrator appointed by British College Overseas SL (particularly if the concern relates to the school leadership team)

Concerns may be submitted:

- Verbally (in person)
- In writing (letter or email)

All reports must include as much detail as possible, including relevant dates, names, locations, and any evidence.

### **4. Confidentiality and Data Protection**

All reports will be treated in strict confidence and in accordance with the Andorran Data Protection Law. Personal data collected in the course of a whistleblowing report will be processed solely for investigation and compliance purposes. Where disclosure of the whistleblower's identity is necessary (e.g. legal proceedings), the individual will be informed beforehand unless prohibited by law.

### **5. Anonymous Reports**

Anonymous reports will be considered; however, anonymity may limit the ability to investigate effectively or follow up. BCA encourages whistleblowers to identify themselves in confidence where possible.

## **6. Protection from Retaliation**

The British College of Andorra prohibits any form of retaliation or victimisation against individuals who raise concerns in good faith. In the case of employees, any retaliation will be treated as a disciplinary offence and may result in dismissal or legal consequences.

Protection applies even if the concern turns out to be unfounded, provided it was reported honestly and in good faith.

## **7. Investigation Process**

7.1 The Principal and the Administrator, if they are not the recipient of the concern/report, must both be informed. Upon receiving a report, an initial review will determine whether a formal investigation is needed. An impartial investigator (internal or external) will then be appointed.

7.2 Whistleblowing is the act of reporting or exposing wrongdoing, illegal activity, or unethical behavior within an organization. Concerns may therefore refer to alleged misconduct by an individual.

7.3 Effective management of an allegation relies on expertise and clear judgment. The school may need to seek additional and external advice regarding any of the types of concerns listed in section 1, above, where it is clear that it does not have sufficient expertise, and/or independence, to investigate the matter effectively itself.

7.4 Where it is deemed appropriate to consult the Police, this must be done at the earliest possible moment. Police will advise what activities can be undertaken by the school while a criminal investigation is being considered or conducted. It is important that an inquiry undertaken by the school does not conflict with any investigation led by any external agency such as the police. Gathering evidence and admissibility are key elements that the police will want to protect.

7.5 Where an allegation has been made against an employee, the school's investigation must exercise due diligence, impartiality and legal compliance.

7.6 Where a concern has been raised or an allegation has been made against an adult in relation about their suitability to work with children, the school will follow the extensive guidance and current best practice in the document "Managing allegations of child abuse by educators and other adults- Protocol for international schools", September 2024, International Taskforce on Child Protection (ITFCP)

7.7 Findings will be reported to the Principal and Administrator.

7.8 Any disciplinary action or legal steps will be taken in accordance with school policy and Andorran law.

7.9 The whistleblower will receive feedback, unless limited by confidentiality or legal constraints.

#### 8. Malicious or False Allegations

Deliberate misuse of this policy to make knowingly false or malicious allegations may result in disciplinary action.

#### 9. Record Keeping and Reporting

Records of whistleblowing reports, investigations, and outcomes will be securely stored and retained in a legally appropriate manner.

Policy Approved: Principal  
April 2025