PORG International School

Whistleblowing Policy

Prepared by:	Barbora Gazdova	Date: September 2023
Last update by:	Barbora Gazdova	Date: August 2026
Approved by:	Dagmar Dluhosova	

Introduction

This policy explains how anyone working for or with PORG International School can report suspected wrongdoing, unlawful conduct, unsafe practice or failures in safeguarding. It sets out the school's internal reporting route under the Czech whistleblower framework, the steps the designated person will take, and the protections available to reporters. It should be read alongside the Safeguarding and Child Protection Policy, Staff Code of Conduct, Allegations Against Staff procedure, Complaints Policy, Grievance procedure and Data Protection Policy.

PORG International School is committed to an open culture in which concerns are heard and acted on. A reporter does not need to prove wrongdoing. They should have reasonable grounds for believing the information is true and should share what they know promptly. The school will handle reports impartially, protect confidentiality as far as the law permits, and take reasonable steps to prevent retaliation.

Overview of this policy

- Purpose and principles
- Scope and definitions
- What should be reported
- How to make a report
- What happens after a report
- Confidentiality, anonymity and records
- Protection from retaliation
- Safeguarding and urgent concerns
- Roles and responsibilities
- Approval, communication and review
- Policy control and implementation
- Appendix: reporting contacts at a glance

Purpose and principles

This policy applies to reports of possible breaches of law and serious wrongdoing connected with work or another comparable activity. It is designed to support the Czech Act No. 171/2023 Coll. on the Protection of Whistleblowers (the Act), the school's safeguarding responsibilities, and the standards expected of a British international school.

Reports may concern something that has happened, is happening or is likely to happen, including an attempt to conceal wrongdoing. The school will consider a report according to its substance, even if it is not labelled "whistleblowing".

- Reports are considered objectively and without undue delay.
- The reporter is not expected to investigate or collect evidence beyond information already available to them.

- A report can be made internally or directly to the Czech Ministry of Justice. A reporter is not required to report internally first.
- The identity of the reporter and other people named in the report is restricted to those who need it to fulfil their duties.
- The school prohibits retaliation against anyone who reports in good faith or assists with an investigation.

Scope and definitions

This policy applies to PORG International School staff, including employees, former employees and job applicants, as well as people carrying out work or another comparable activity for the school. This may include self-employed people, suppliers and contractors, members of school bodies, volunteers, trainees, interns and people whose work relationship has ended or has not yet begun.

For the purposes of this policy, a "reporter" is a natural person who obtains information about possible unlawful conduct in connection with work or another comparable activity and reports it through an available channel. The statutory protections apply when the legal conditions in the Act are met. This school policy also provides a route for concerns that may need action under safeguarding, employment or other school procedures, even if they do not qualify for statutory protection under the Act.

What should be reported

A report under the Act may concern a suspected breach falling within the Act's scope, including a criminal offence; an offence for which the maximum fine is at least CZK 100,000; a breach of the Act; or a breach of a legal rule in an area covered by the Act. Those areas include, among others, financial services, corporate tax, anti-money laundering, consumer protection, product safety, transport safety, environmental protection, food and animal safety, public procurement, public health and safety, personal data, network and information-system security, EU financial interests and the EU internal market.

Examples relevant to a school may include suspected fraud or misuse of funds, unlawful procurement, serious health and safety risks, unlawful handling of personal data, or serious safeguarding failures involving unlawful conduct. Concerns about child safety or poor safeguarding practice must also be raised under the school's safeguarding procedures, even if the reporter is unsure whether the matter falls within the Act.

Individual employment grievances, such as a personal disagreement about pay, workload or a management decision, should normally be raised under the grievance procedure. If the grievance also reveals a wider legal breach, risk to pupils or the public, or a pattern affecting others, the whistleblowing route may also be appropriate. Parent or pupil complaints should normally use the Complaints Policy unless they reveal serious wrongdoing requiring immediate safeguarding action.

How to make a report

Use one of the routes below. The external designated person receives and assesses statutory reports independently. You may make a report in Czech or English. Include dates, locations, people involved, the conduct you are concerned about, any records or witnesses that may help, and a safe way to contact you. Do not delay a report because you do not have every detail.

Route	**How to report**
Online	Visit www.oznam.to, choose the option to make a report, enter PIN B5J5, complete the form and submit it. Keep the access details supplied by the system so you can receive updates.
Email	JUDr. Robert Pecka, LL.M. — pecka@lexnova.cz
Telephone	JUDr. Robert Pecka, LL.M. — +420 737 209 716
In person	Contact the designated person by email or telephone to arrange a meeting. On request, the designated person must receive a report in person within 14 days.
Post	Send a sealed envelope marked "Whistleblowing" to: Whistleblowing, PORG International School, Rostislavova 1267/7, Ostrava, 703 00. Use this route only after the implementation check in the policy control section is complete.
External report	Report directly to the Czech Ministry of Justice through its external system at www.oznamovatel.justice.cz. You do not have to explain why you chose the external route.

The internal Oznam.to system does not accept anonymous statutory reports under the arrangements described in the supplied PORG information. An anonymous report may still be raised as a general concern with the school, but it may be harder to investigate or provide feedback. A person who reports anonymously may receive statutory protection if their identity later becomes known and the other legal conditions are met.

A reporter may contact the Czech Ministry of Justice even where an internal system is available or appears to be working. External reports may be made through the Ministry's online form or by other published means. If a concern involves the Head of School, the Proprietor or the designated person, or if the reporter reasonably doubts that an internal report will be handled impartially, use an independent or external route.

What happens after a report

The designated person will consider the report objectively and confidentially. They may contact the reporter to clarify information or ask for supporting material. The reporter should not approach the person named in the report or conduct an independent investigation.

1. The designated person will acknowledge receipt in writing within 7 days, unless the reporter has asked not to receive an acknowledgement or doing so would reveal the reporter's identity to another person.
2. The designated person will assess whether the report is within the Act and whether there are reasonable grounds for concern. If it is outside the Act, the reporter will be told in writing without undue delay and, where appropriate, advised about a suitable route.
3. The designated person will notify the reporter of the assessment result within 30 days of receipt. In a factually or legally complex matter, this period may be extended by up to 30 days, no more than twice. The reporter must be told in writing before the current deadline, with the reason for the extension.
4. If the report is substantiated, the designated person will recommend appropriate steps to prevent or correct the unlawful conduct. The school will consider and implement appropriate corrective action, or refer the matter to a competent authority where required.
5. The designated person will inform the reporter of the outcome and any permitted feedback. Information may be limited to protect a child, another person's privacy, a confidential investigation or legal obligations.

A report concerning a suspected crime, immediate threat or child protection risk may be referred to the appropriate Czech authority or emergency service without waiting for the internal assessment to finish. The reporter will be informed where lawful and safe to do so.

Confidentiality, anonymity and records

The designated person will protect the reporter's identity and any information from which it could be inferred. The identity will not be disclosed to another person without the reporter's express consent, except where disclosure is required by law. Where disclosure is legally required, the reporter will be informed in advance where that is lawful and practicable.

The person named in a report is also entitled to fair treatment and protection of their personal data. A report is an allegation to be assessed, not a finding of wrongdoing. Information will be shared only on a need-to-know basis and processed in accordance with the GDPR, Czech data-protection law and the school's data-retention arrangements.

The designated person will maintain a secure record of statutory reports and related documents for five years from the date the report was received, as required by the Act. Access to the statutory register and the report file is restricted to the designated person. Safeguarding or employment records created through a separate procedure will be stored in the appropriate restricted file and retained under the relevant policy.

Protection from retaliation

The school prohibits direct or indirect retaliation against a reporter who has reasonable grounds to believe that the information reported is true and reports through a lawful route. Protection also applies to other persons covered by the Act, such as people who assist the reporter or are connected with them, where the law provides that protection.

Retaliation may include dismissal, non-renewal of a fixed-term contract, reduction in pay, demotion, threats, bullying, adverse changes to working conditions, exclusion from training or other unjustified disadvantage. Anyone who believes retaliation has occurred should report it promptly to the Proprietor or directly to the Ministry of Justice. A report that is not substantiated does not, by itself, justify action against the reporter.

Knowingly making a false report is not protected and may constitute an offence under the Act. The school will distinguish a knowingly false report from a report made honestly on reasonable grounds that cannot be substantiated.

Safeguarding and urgent concerns

Whistleblowing is one part of the school's safeguarding culture. Any immediate concern about a pupil's safety must be reported straight away to the Designated Safeguarding Lead, Thabang Lehner, or Deputy DSL, Barbora Gazdova, under the Safeguarding and Child Protection Policy. If either person is involved, or the reporter cannot safely use that route, report to the Proprietor or the competent Czech authority. In an emergency, call 112; for the Police of the Czech Republic, call 158.

A report about poor or unsafe safeguarding practice may be made under this policy even when it is not clear whether the conduct falls within the statutory scope of the Act. The school will ensure that the safeguarding response is not delayed while the statutory classification is considered. For external advice about child protection failures in a school using the English safeguarding framework, staff may contact the NSPCC Whistleblowing Advice Line at 0800 028 0285 or help@nspcc.org.uk.

Roles and responsibilities

The designated person receives and assesses statutory reports, protects the identity of the reporter, maintains the statutory register, observes the legal deadlines, recommends corrective action and informs the reporter of the result. They must act independently and impartially and must not be directed or obstructed in carrying out these duties.

The Head of School receives wider school concerns and ensures immediate safeguarding, safety or operational action where needed. The Head does not investigate a statutory report assigned to the designated person. If the concern involves the Head, the reporter should go directly to the Proprietor, designated person or an external authority.

The Proprietor ensures appropriate reporting arrangements are in place, confirms the designated person's appointment for the school's legal entity, considers recommendations for corrective action and monitors protection from retaliation. Any person implicated in a report must not receive, investigate or decide that report.

All staff and people covered by this policy should report concerns promptly, preserve relevant information, maintain appropriate confidentiality and cooperate honestly with an investigation. They must not attempt to identify a reporter who has sought confidentiality.

Approval, communication and review

Before this policy is approved and published, the Proprietor will confirm that the designated person and the Oznam.to PIN identified in the supplied PORG whistleblowing materials are formally appointed and active for the legal entity operating PORG International School. The same check will confirm that the published postal route is correct for the school. If the current registration does not cover the school's legal entity, the Proprietor will put the correct school-specific arrangement in place and update this policy before publication.

The school will provide this policy to staff and relevant contractors, explain how to raise concerns during induction and ensure that current reporting details remain accessible. The policy will be reviewed annually and whenever the law, the school's legal status, its reporting system or safeguarding arrangements change.

Policy control and implementation

Policy owner	Head of School and Proprietor
Approving authority	Proprietor
Designated person	JUDr. Robert Pecka, LL.M. (external)
Internal system	Oznam.to; PIN B5J5
Review cycle	Annually and after a significant change or incident
Implementation check	Before approval, confirm the designated person and Oznam.to registration cover the legal entity operating PORG International School.

Appendix: Reporting contacts at a glance

- Statutory internal report: www.oznam.to — PIN B5J5 (subject to the implementation check above).
- Designated person: JUDr. Robert Pecka, LL.M. | pecka@lexnova.cz | +420 737 209 716.
- Written report: sealed envelope marked “Whistleblowing” to the postal address in section 4, once confirmed for PORG International School.
- External report: Czech Ministry of Justice — www.oznamovatel.justice.cz.
- Child protection: DSL Thabang Lehner or Deputy DSL Barbora Gazdova; if implicated, bypass and report to the Proprietor Dagmar Dluhosova or competent authority.
- Emergency: 112; Police of the Czech Republic: 158.