

Whistleblowing Policy and Procedure guidance

Introduction

We encourage colleagues and others with serious concerns about any aspect of the ISP's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that colleagues can do something without fear of reprisals. This Whistleblowing Policy is intended to encourage and enable colleagues to raise serious concerns within ISP initially so that they can be resolved speedily and appropriately.

That concern may be about something that:

- comprises the physical, emotional, or sexual abuse of pupils or staff
- is unlawful (e.g., theft, bribery, or fraud); or
- constitutes failure to comply with a legal regulation; or
- endangers an individual's health and safety; or
- risks or damages the environment; or
- is against ISP's financial regulations or policies; or
- covers up wrongdoing; or
- is a miscarriage of justice; or
- amounts to improper conduct.

Personal grievances are not covered by the whistleblowing policy. Personal grievances should therefore be raised under the relevant Grievance Procedure.

Safeguards

Harassment, Bullying or Victimisation

ISP recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. We will not tolerate harassment, bullying or victimisation and will take action to protect colleagues when they raise a grievance or concern in good faith. This does not mean, however, that if colleagues are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

Confidentiality

ISP will do its best to protect colleagues' identity when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and that colleagues may be required to give a statement as part of the evidence.

Anonymous Allegations

This policy encourages colleagues to put their name to an allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of ISP. In exercising the discretion, the factors to be taken into account would include the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from other attributable sources.

Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the schools' students' and staff's best interest to do so even if the

allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the schools' students' and staff's best interest to do so (e.g., making an allegation frivolously, maliciously or for personal gain).

1 Appendix 1 – ISP Whistleblowing Policy - Schools

The Hamilton International School

1. Introduction

International Schools Partnership and the Principal are committed to delivering a high- quality education service to pupils and expect high standards from their staff and contractors. In order to maintain these high standards a culture of openness and accountability is vitally important. The aims of this policy are threefold: -

- to encourage staff to raise concerns about malpractice within the School without fear of reprisal
- to reassure staff that concerns will be taken seriously
- to provide information about how to raise concerns and explain how the Principal and ISP may respond.

2. Scope of the Policy

This policy applies to all School employees, agency staff, contractors and volunteers engaged by the School. There is a separate procedure for pupils and parents to raise concerns about school related issues.

3. What is whistleblowing?

In practical terms, whistleblowing occurs when a concern is raised about danger or illegality that affects others. As the person raising the concern you will not necessarily be directly affected by the danger or illegality. Consequently, you will not necessarily have a personal interest in the outcome of any investigation into your concerns. This is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated. This poor treatment could involve a breach of your individual employment rights or bullying, and you are entitled to seek redress for yourself.

4. Raising concerns on Malpractice


Malpractice covers a wide range of concerns. The types of activity that should be disclosed include but are not limited to the following: -

- the physical, emotional, or sexual abuse of pupils or staff
- unauthorised use of School funds and/or financial maladministration
- fraud and corruption
- failure to comply with legal obligations
- endangering of an individual's health and safety
- damage to the environment
- a criminal offence
- failure to follow financial and contract procedure rules
- showing undue favour to a contractor or a job applicant
- miscarriages of justice

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- deliberate concealment of information relating to any of the above
- concerns about the professional practice or competence of colleagues, other members of staff or other workers

Staff should raise their concerns with the Principal. The earlier a concern is raised the easier it will be to take action. You the whistleblower are a witness to events not the investigator. You do not need to wait for compelling evidence of malpractice before raising concerns, but you must have reasonable grounds for your suspicion.

When reporting a concern, you should provide as much information and detail as possible. In particular you should provide the full names of the people involved or who know about what is happening, including dates of events and any relevant documentation. This will help the investigator to focus on the main issues quickly.

There will be some cases where it is not appropriate for you to raise concerns with your Principal, for example where you suspect your Principal already knows about the malpractice or where you suspect your Principal may be involved. In those cases, you should report your concerns to the Regional Whistleblowing Officer, Mina Ansari, Regional Head of HR mansari@ispschools.com.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. You will be advised whether an investigation takes place or not.

5. Advice and Support

The School recognises that staff may wish to seek advice before raising concerns and the school has no objection to you doing this provided you have maintained confidentiality and you do not breach any local laws (e.g., defamation laws)

Whistleblowers who consider that they have been victimised as a result of whistleblowing should make a formal complaint to the ISP Regional Head of HR immediately giving details of the way in which they believe they have been subject to detriment and their reasons for thinking that the detriment might be connected with their disclosure.

6. Confidentiality

The School understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager or indeed at all. As such, the School recognises that whistleblowers may wish to raise concerns in confidence. If you (the whistleblower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first.

7. Anonymous Allegations

It is recognised that the purpose of a whistleblowing policy is to allow people to make protected disclosure with the protection being against any reprisals or victimisation for disclosures made honestly and in good faith. It is very difficult for some people to come forward and make a disclosure and the prospect of having to identify yourself can make the action of whistleblowing all the more daunting. You are encouraged to give your name when raising concerns. A concern expressed anonymously is much less powerful and is often more difficult to investigate and can lack credibility. The

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decision whether to investigate an anonymous allegation will be made by the Principal and Regional Manager. When making this decision they will take into account the seriousness of the issues raised, the credibility of what is being said and the likelihood of confirming the allegation from other sources.

8. Protection for the Whistleblower

All concerns raised under this procedure will be treated seriously and a decision made about whether an investigation is appropriate. Depending upon the nature of the matter it may be referred to the external auditor or the police. The person to whom you reported your concern will be responsible for keeping you informed about the progress of the investigation and the action, which has been taken, although you may not be told the outcome. In some cases, the investigation may result in criminal or disciplinary proceedings. If this happens you may be invited to give a written statement or give evidence at a hearing. The Principal will support you in this process and ensure that you are clear about what will happen.

9. Allegations not made in good faith

The school will not tolerate abuse of this Policy. Concerns that are raised frivolously, maliciously, or where they are known to be untrue may result in disciplinary action or, in the case of agency staff, the termination of the agency contract. In the case of contractors, the matter will be reported to the relevant Contract Manager so that a decision can be made about the appropriate action to take.

10. Reviews and Operation of this Policy

ISP in partnership with the school has overall responsibility for the operation of this policy.