

Whistleblowing Policy

Revised: 1 October 2021

Approved by: Divisional Chief Executive
Officer, Asia

Rationale

As an organisation, we are committed to the highest standards of honesty, integrity, transparency and probity and seek to always conduct our affairs in a responsible and accountable manner in line with our principles and values.

A culture of openness and accountability is essential to protect our organisation against things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. We encourage those working for us to report any concerns about potential wrongdoing or perceived dangers through the proper channels, as early as possible, so that they can be investigated and resolved.

All colleagues have an important role in achieving this goal. Colleagues will usually be the first to know when someone in the organisation is doing something illegal or improper but often feel worried about voicing their concerns.

The aim of this policy and procedure is to cover the reporting of any genuine concerns colleagues may have about suspected wrongdoing within the organisation.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour). Our Whistleblowing Policy:

- encourages colleagues to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated appropriately, and that confidentiality will be respected
- provides colleagues with guidance as to how to raise such concerns
- reassures colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

The policies are in line with this rationale, support ISP Principles and is compliant with local legislation and good practice.

The Schools and Regional Office whistleblowing policy and procedure has been adapted in line with the guidance set out in this document.

- School whistleblowing policy (refer to Appendix 1).
- Regional Office whistleblowing policy (refer to Appendix 2)

Whistleblowing Policy and Procedure

Introduction

We encourage colleagues and others with serious legitimate concerns about illegal, unethical or questionable practices and conduct 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 initially so that they can be objectively investigated and resolved speedily.

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 whistleblowing and should therefore be raised under the relevant Grievance Procedure.

We strongly encourage you to raise concerns internally through the available channels. Taking a concern to an outside party (e.g. the media) can have serious implications. By raising concerns internally, this gives our Company the chance to look into the matter and take action if needed. In this way we can truly improve our Company together.

Safeguards

Harassment, Bullying or Victimisation

The Company 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

The Company 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 the Company. In exercising the discretion, the factors to be considered 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 the information and allegations are substantially true, 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 (e.g. making an allegation frivolously, maliciously or for personal gain).



Appendix 1

ISP Schools Whistleblowing Policy

1.0 Introduction

ISP and The Campus Principal are committed to delivering 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:

- 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 concerns raised will be addressed.

1.2 Parties who can raise a concern

This policy applies to all School staff (full time or contract staff), 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.

1.3 Definition of whistleblowing

In practical terms, whistleblowing occurs when a concern is raised about a danger, illegality or unethical conduct **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.

Whistleblowing 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.

1.4 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
- 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
- conflict of interest

1.5 Raising Concern(s)

Concerns should be raised with the Campus Principal. The earlier a concern is raised the easier it will be to take action. You the whistle blower 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. You should provide the following to help the investigator to focus on the main issues quickly:

- the full names of the people involved or who know about what is happening,
- dates of events and
- any relevant supporting evidence or documentation.

There will be some cases where it is not appropriate for you to raise concerns with your Campus Principal, for example where you suspect your Campus Principal already knows about the malpractice or where you suspect your Campus Principal may be involved. In those cases, you should report your concerns to the Regional Managing Director. (email: anicol@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.

1.6 Advice and Support

Whistle blowers who consider that they have been victimised as a result of whistleblowing should make a formal complaint to the Campus Principal or the schools' Human Resources Department 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 relate to their disclosure. The complaint is to be escalated to the Regional Managing Director if it is deemed



not appropriate to be raised with the Campus Principal or schools' Human Resource Department.

ISP is committed to protecting the committed to protecting the whistle blower from all acts of harassment, retaliation, victimisation and recrimination arising from making the disclosure in good faith.

1.7 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 whistle blowers may wish to raise concerns in confidence. If you (the whistle blower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first.

1.8 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 even 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 decision whether to investigate an anonymous allegation will be made by the Campus Principal or the Regional Managing Director (depending who handles the complaint). When making this decision, the seriousness of the issues raised, the credibility of what is being said and the likelihood of confirming the allegation from other sources will be considered.

1.9 Protection for the Whistle blower

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 further 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 Campus Principal or Head of Human Resources at the regional office will support you in this process and ensure that you are clear about what will happen.



1.10 Allegations not made in the public interest

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 Manager in-charge of the contract so that a decision can be made about the appropriate action to take.

1.11 Reviews and Operation of this Policy

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

Appendix 2

Regional Office Whistleblowing Procedure

The procedure is intended to conform to the guidance in the Whistleblower Protection Act 2010 (WPA)

How to raise concerns

As a first step, colleagues should normally raise the concerns with their immediate line manager.

This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should as a matter of urgency approach:

- The Head of Human Resources (email:jgurdip@ispschools.com) who is the Whistleblowing Officer and the Regional Managing Director. (email: anicol@ispschools.com)
- The Group Head of People Operations, Jo Pertwee (email: jpertwee@ispschools.com) if you are unable to raise the matter within the Regional office.

Concerns are better raised in writing. Colleagues are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If a colleague feels unable to put their concern in writing, they can telephone or arrange to meet with the individual(s) the matter is being raised with. The earlier a colleague expresses a concern, the easier it is to take action.

Although colleagues are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for their concern.

How we will respond

The action taken by ISP will depend on the nature of the concern. The matters raised may:

- be investigated internally
- be referred to the Police or external authorities
- be referred to the external auditor

To protect individuals and ISP, initial enquires will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of a concern being received, ISP will write to the colleague:



- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling the colleague whether any initial enquiries have been made; and
- telling the colleague whether further investigations will take place, and if not, why not.

The amount of contact between those considering the issues and the colleague will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the colleague.

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