



Whistleblowing

VERSION NUMBER:	1.0
OWNER:	REGIONAL HEAD OF HUMAN RESOURCES LATAM
TYPE OF PAPER:	POLICY APPLICATION NOTE
TOPIC AREA:	HR
DOCUMENT REF:	WHISTLEBLOWING

A. PURPOSE

The purpose of this Policy Application Note is to set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on whistleblowing, and to provide information and guidance to those working for us on how to recognise and deal with a member of staff's genuine concern. This Policy reflects our encouragement of those working for us to report any concerns about wrongdoing or dangers internally through the proper channels, and as early as possible, so that they can be investigated and resolved.

B. SCOPE

This Policy Statement is **mandatory** for all Schools in the Group, and all parts of the business including ISP head office, and ISP regional offices.

This policy and its application applies to the ISP LatAm regional team, and St Jude School Costa Rica.

C. DEFINITIONS

Group: ISP and any subsidiary or related group company.

ISP: International Schools Partnership Limited.

ISP Management Board (or "SMT"): The ISP senior management team.

ISP Board: The board of directors of ISP. This is the Group's strategic board.

Line Manager: The person who has direct line managerial responsibility for the employee. The Line Manager's responsibilities, as detailed in this procedure, may be performed by a manager of equivalent seniority or a more senior member of staff.

Region: The country of Costa Rica.

Regional Managing Director: the regional managers responsible for each Region within the ISP Group.

Regional Whistleblowing Officer: The nominated person in each Region to whom Whistleblowers can report Whistleblowing concerns.

School: Any school into the Region which is part of the ISP Group.

School Staff: Any person employed or engaged by a School.

Whistleblowing: The disclosure of information which relates to suspected wrongdoing or dangers at work. This may include criminal activity; failure to comply with any legal obligation; concerns around safeguarding and/or pupil safety, danger to health and safety; bribery under our Anti-Bribery Policy Statement and Region' Policy Application Notes; or other workplace specific concerns.

Whistleblower: A person who raises a genuine concern related to suspected wrongdoing or danger.

D. ROLES AND RESPONSIBILITIES

The ISP Board has overall responsibility for ensuring that this Policy Application Notes complies with our legal and ethical obligations, and that those under ISP's control comply with it.

The Policy Owner has delegated responsibility for oversight of the implementation of this Policy Application Notes, and is responsible for appropriate reporting under this Policy Application Notes to the ISP Board, which shall be a minimum of once a year.

The Policy Owner on behalf of the ISP Board will monitor the effectiveness of this Policy Application Notes through regular review, and via an internal audit process. This will include an annual review of this Policy Application Notes undertaken by the Policy Owner.

The ISP Management Board is responsible for ensuring the implementation of this Policy across the Region and delegates day to day responsibility in the Region to the Group Directors of Schools, who in turn are responsible for:

- Developing this Policy Application Notes, which are fully compliant with the Policy Statement and approved by the Policy Owner;
- Keeping this Policy Application Notes under regular review, and communicating any updates;
- Ensuring each School has its own policy applicable to School Staff, which is fully compliant with the Policy Statement and this Policy Application Notes; and
- Monitoring the implementation and effectiveness of each School's policy.

All ISP Group employees in roles that may be impacted by whistleblowing must ensure that they read, understand, and comply with the Policy Statement, and this Policy Application Notes and School policies. The following roles are automatically deemed to be impacted by whistleblowing:

- All members of the ISP Board;
- All members of the ISP Management Board;
- All Group Directors of Schools;
- All Regional team members;
- All Head Teachers;
- All Finance Staff; and
- All Human Resources Staff in Schools and in the regional ISP team.

The Regional Managing Director must ensure that appropriate training is put in place for relevant staff, appropriate to their role and in accordance with this Policy Application Notes.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this Policy Application Notes. If anyone is unclear on any aspect relating to the application of this Policy Application Notes, they should seek guidance from the Regional Managing Director for the Region or the Policy Owner.

E. REGIONAL PRINCIPLES

All Regions and Schools must have in place their own whistleblowing policy which is consistent with this Policy Application Notes and with local laws but also reflects the following principles:

- We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct.

- All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- If a member of staff has a genuine whistleblowing concern, they should report it in accordance with this Policy Application Notes.
- Whistleblowers should be assured a genuine whistleblowing concern will be taken seriously and investigated appropriately, and that their confidentiality will be respected.
- Whistleblowers should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- We hope that in most cases staff will raise their concern with their Line Manager. However, where the matter is more serious, or the staff member feels that their Line Manager has not addressed their concern, or the staff member prefers not to raise it with them for any reason, the staff member should inform the Regional Whistleblowing Officer. Each Region's Policy Application Note should confirm the name and contact details for the Regional Whistleblowing Officer.
- In most cases, whistleblowers should not find it necessary to alert anyone outside of the School, Region or ISP. However, Policy Application Notes will determine whether under local laws it is appropriate for staff members to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media.
- Any concerns raised by a whistleblower should be fully investigated and the outcome confirmed to the Regional Managing Director Latam. The Regional Managing Director Latam shall have discretion to determine what information should be provided to the whistleblower, and whether the whistleblower should be notified of the outcome.
- Whistleblowers should not suffer any detrimental treatment as a result of raising a genuine concern.
- If a whistleblower makes false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action in accordance with our Disciplinary Policy Statement and the Region' Disciplinary Policy Application Note.
- This Policy Statement should not be used for complaints relating to a staff member's own personal circumstances, such as the way they have been treated at work. In those cases, the staff member should follow our Grievance Policy Statement and the Region Policy Application Notes for the Grievance Policy.

F. WHISTLEBLOWING PROCEDURE

- As soon as a staff member is aware of any criminal activity; failure to comply with any legal obligation; concerns regarding safeguarding and/or pupil safety; danger to health and safety; bribery under our Anti-Bribery Policy Statement and Regional Policy Application Note; or other workplace specific concerns, the employee shall raise their concern with his/her line manager. In most cases, staff will raise their concern with their Line Manager. However, where the matter is more serious, or the staff member feels that their Line Manager has not addressed their concern, or the staff member prefers not to raise it with them for any reason, the staff member should inform the Regional Whistleblowing Officer.
- The name and contact details for the Regional Whistleblowing Office are as follows:

Name: Coral Villarreal Berra

e-mail: cvillarreal@ispschools.com
- If a staff member raises the concern to his/her line manager, both will inform of this situation to the Regional Whistleblowing Officer.
- As soon as the Regional Whistleblowing Officer is aware of the issue, she/he shall initiate an in-depth investigation. If the outcome of such investigation has profound evidence that the act has been committed, the Regional Whistleblowing Officer shall inform the Regional Managing Director Latam, and when applicable, she/he shall also suggest measures to be taken to resolve the situation.
- In case the Whistleblowing act involves any activity forbidden or a legal failure according to Costa Rican Law and Regulation, the Whistleblower has a duty to report this to Costa Rica authorities and will contact the school lawyer for legal advice.

- Where appropriate, the Regional Whistleblowing Officer shall conduct a due diligence process, to ensure that the resolution is executed correctly and that the problem resolves and does not happen again.

G. CROSS REFERRED POLICIES

This Policy Application Note should be read alongside the following:

- Anti-Bribery Policy Statement;
- Code of Conduct;
- Disciplinary Policy Statement;
- Grievance Policy Statement;
- Safeguarding Policy Statement.