MexCCA Whistleblowing Policy

Policy Owner: MexCCA Regional HR Director

Revised: October 2026

PURPOSE AND SCOPE

The **International Schools Partnership** schools expect the highest standards of integrity from everyone who works with them. This policy aims to ensure anyone can raise a concern without fear of reprisal, knowing it will be taken seriously and exactly how to do it.

It applies equally to all ISP schools and to the MexCCA regional office (Mexico, Costa Rica, Panama and Dominican Republic). It covers all staff, agency or outsourced staff, contractors, suppliers working on campus and volunteers. Parents and members of the public can also raise a whistleblowing concern through the channels in this policy.

WHAT IS WHISTLEBLOWING?

Whistleblowing is raising a concern about danger, wrongdoing or illegality that affects others. The person raising it does not need to be affected or have a personal interest in the outcome.

It is different from a complaint or grievance, which is when someone feels they have personally been treated poorly. Workplace complaints are handled through the employee grievance procedure, and parent complaints through the school complaints procedure. If in doubt, report it through this policy and we will guide you.

WHAT SHOULD BE REPORTED?

Any concern about something that:

1. Comprises the physical, emotional or sexual abuse of pupils or staff.
2. Is unlawful, for example theft, bribery or fraud.
3. Constitutes a failure to comply with a law or regulation.
4. Endangers an individual's health and safety.
5. Risks or damages the environment.
6. Is against ISP's financial regulations or policies, for example unauthorised use of funds or showing undue favour to a supplier or candidate.
7. Covers up wrongdoing.
8. Is a miscarriage of justice.
9. Amounts to improper conduct, including serious concerns about a colleague's professional practice.

Low-level concerns. These must also be reported. They are any concern, even just a sense of unease, that someone may have acted in a way inconsistent with the ISP Code of Conduct without reaching the level of a safeguarding report. For example: being over-friendly or having favourites among students or staff, isolated inappropriate comments, or not following a procedure. You can even report a situation of your own that could have been misinterpreted. Addressing them early prevents bigger problems.

HOW TO REPORT

Reporting is everyone's responsibility: it stops problems from escalating, protects others and avoids you becoming implicated by staying silent. Use the Concern Report Form (Appendix A) and submit it according to who is involved:

If the concern involves…	**Report it to…**
A student or their wellbeing	Designated Safeguarding Lead (DSL), under the Child Protection and Safeguarding Policy
An employee, contractor, supplier or volunteer	School HR & Head of School
The Head of School, or you believe they already know and have not acted	Regional HR Director & Regional Managing Director (RMD)

Include what happened, the names of those involved and of anyone who knows, dates, places and any documents you have. You do not need proof, only a genuine reason for concern: you are a witness, not the investigator. Do not investigate on your own or confront the person.

If you do not feel able to raise your concern through these channels, for any reason, you can report it directly to ISP at Group level by email at whistleblowing@ispschools.com or through https://internationalschoolspartnership.com/whistleblowing/. Reports through this channel can be anonymous, as your name, phone number and email address are optional.

WHAT HAPPENS NEXT

1. **Registration.** The report is logged with a reference number.
2. **Initial review.** School HR and the Head of School (or the Regional HR Director and the RMD, if the Head of School is involved) decide whether and how to investigate. Anyone involved in the matter or with a conflict of interest steps aside. If a student is involved, the Safeguarding Policy also applies, including notifying the RMD within 60 minutes.
3. **Urgent measures.** If there is a risk, immediate steps may be taken to protect people and preserve evidence.
4. **Written response within 10 working days.** We confirm we received your report.
5. **Handling and closure.** The matter may be resolved by agreed action, investigated internally, referred to audit or, where appropriate, to the authorities. For confidentiality reasons the details or actions taken may not be shared.

In meetings about your report you may be accompanied by a colleague of your choice. Low-level concerns are handled by the Head of School; if they recur or escalate, they are referred to the Regional HR Director and the RMD. Anonymous reports are reviewed by the Head of School and the RMD, or by the Regional HR Director and the RMD if the Head of School is involved, considering their seriousness, credibility and whether they can be confirmed from other sources.

PROTECTION AND CONFIDENTIALITY

- **No retaliation.** No one will be penalized or treated differently for reporting in good faith, even if the concern is not confirmed. Retaliation against a whistleblower is serious misconduct. If you believe you are experiencing it, tell School HR or the Regional HR Director immediately.
- **Confidentiality.** Your identity will only be known to those who need it to handle the case. If it must be disclosed, this will be discussed with you first. Everyone involved in the process must keep it confidential; failing to do so may lead to disciplinary action.
- **Anonymity.** Anonymous reports are accepted, but we ask you to give your name: an anonymous report is much harder to investigate.
- **Bad faith.** A report made knowing it is false or with malicious intent may lead to disciplinary action or, for agency staff, contractors and suppliers, termination of the contract.
- **Ongoing processes.** Reporting does not stop a disciplinary process already open for the person reporting.
- **Support.** School HR supports both the person reporting and the person under review, who also has the right to be heard.

RELATED POLICIES, RECORDS AND REVIEW

This policy complements ISP's Child Protection and Safeguarding Policy, Code of Conduct, Anti-Bribery and Corruption Policy and Dignity at Work Policy, as well as each school's grievance procedure and internal work rules. It does not limit anyone's right to go to the authorities, nor the school's duty to notify them when the law requires it.

School HR keeps a confidential record of all reports. All staff receive this policy when they join and at the start of each school year and sign the acknowledgement (Appendix B). Each Head of School is responsible for applying it, and MexCCA Regional HR reviews the records to spot patterns.

ISP, in partnership with each school, has overall responsibility for the operation of this policy, which is reviewed every year or sooner if ISP guidance or local law changes.

CONCERN REPORT FORM

Appendix A. Confidential. Submit according to the section "How to report"

Field	Answer
School	
Name and role of person reporting (optional, but recommended)	
Date of report	
Person(s) involved and their role	
What happened or what concerns you	
Date(s) and place(s)	
Witnesses or others who know	
Evidence or documents attached	
Signature of person reporting	
Received by (role), date, signature and reference number	

ACKNOWLEDGMENT OF RECEIPT

I, _____, in the role of _____ at _____ school, confirm that I have received, read and understood the MexCCA Region Whistleblowing Policy, and that I am responsible for reporting any concern under its terms without suffering retaliation for doing so in good faith.

Signature: _____ Date: _____