

## WHISTLEBLOWING POLICY

### A. PURPOSE

International Schools Partnership and Instituto Thomas Jefferson Zona Esmeralda are committed to delivering high-quality education while expecting all staff members to meet high professional standards. In order to uphold these standards, it is essential to foster a culture of openness and accountability.

Therefore, this policy aims to:

- Encourage staff members to report irregularities occurring within the school without fear of retaliation.
- Assure staff members that such reports will be taken seriously.
- Provide information on how to raise a concern and explain how the General Directorate will proceed.

**Staff member:** Any individual employed by Instituto Thomas Jefferson Zona Esmeralda, regardless of their role or position.

### 1. SCOPE AND OBJECTIVES

Instituto Thomas Jefferson Zona Esmeralda aims to:

- Outline the systems and procedures in place to ensure that students are kept safe within the school.
- Raise awareness among all staff members regarding safeguarding/child protection issues, as well as define their roles and responsibilities when reporting potential cases of abuse and/or risk.
- Ensure effective communication among staff members in matters related to safeguarding/child protection and whistleblowing.
- Establish effective procedures for staff members or external providers who identify situations related to safeguarding/child protection concerning students, as well as situations involving poor practice by staff members.

### B. SCOPE

This policy applies to all staff members and external providers of Instituto Thomas Jefferson Zona Esmeralda.

### C. DEFINITIONS

#### 1. Whistleblowing

ISP recognises that students cannot be expected to report risky situations if the adults around them fail to do so. All staff members and external providers must be aware of their responsibility to report actions or attitudes of colleagues that go against a student's wellbeing.

A whistleblowing report may be made against a staff member or external provider at any time. It is essential that all reports are treated seriously and in accordance with the appropriate procedures.

A whistleblowing concern is different from a complaint and may be defined as follows:

- When someone has behaved in a way that has harmed, or may harm, a child emotionally, physically or sexually.
- When someone may have committed a criminal offence against a child and/or a staff member.
- When someone has behaved in a way that poses a risk to a child's physical, emotional and/or sexual health.
- Misuse of school funds and/or financial mismanagement.
- Fraud and corruption.
- Breach of contract.
- Deliberate concealment of information related to any of the above.

## **D. PROCEDURES**

In the event of a whistleblowing concern against a staff member or external provider, you must:

- Request the Whistleblowing Record form from the General Directorate Assistant and complete it by hand, being as specific as possible (including date and time) with objective observations that raise your concern.
- Submit the completed Record in person and exclusively to the General Directorate. It must not be delivered through third parties.
- If it is not possible to submit the Record in person, for example while working remotely, the Record must be completed by hand, scanned, and sent directly from the institutional email account to **ckelly@itj-ze.edu.mx**

Whistleblowing concerns will be investigated by the General Directorate unless the matter involves a criminal offence, in which case the relevant local authorities will be notified to conduct the investigation. In all cases (criminal or non-criminal), the General Directorate and the Regional Human Resources team will be informed as soon as possible. If the concern is raised against a member of the leadership team, the Regional Group of School Directors and the Regional Human Resources Director will be informed.

No investigative action shall be taken before consulting the Regional Human Resources Director, with whom the most appropriate course of action will be determined. If deemed necessary, the staff member concerned may be suspended. Suspension is a neutral act and does not imply guilt.

It is acknowledged that taking such action may cause concern; therefore, the school will make every effort to balance the interests of the individual involved with those necessary to keep students safe. The school will consult the Regional Human Resources Director before acting and will follow all relevant legal requirements applicable to matters of this nature.

Awareness of the expectations set out in the Staff Code of Conduct and appropriate training in safe practices will help reduce the likelihood of whistleblowing concerns arising.

Any individual who raises a concern and believes they have been victimised as a result may submit a formal complaint to their line manager, providing details of why they believe they have been treated unfairly and how this treatment relates to the whistleblowing concern.

It is the responsibility of the employer to ensure that no individual who reports an irregularity is victimised as a result of doing so.

### **Confidentiality**

The school understands that you may feel uncertain about reporting a situation of this nature involving a staff member. Once a whistleblowing concern has been raised, only the General Directorate and/or the Regional Human Resources Director will be aware of the identity of the individual who made the report.

### **Anonymous Reports**

While the purpose of this policy is to allow individuals to raise concerns in a safe environment without fear of retaliation or victimisation, anonymous reports are discouraged. Anonymous reports carry less weight and are more difficult to investigate due to their reduced credibility.



The decision to investigate an anonymous report rests with the General Directorate. This decision will take into account the seriousness of the concern, the credibility of the information provided, and the possibility of corroborating the report through other sources.

#### **Protection for the Whistleblower**

All whistleblowing concerns will be taken seriously, and a decision will be made regarding whether they will be investigated. The General Directorate will be responsible for sharing relevant information with the whistleblower as the investigation progresses. The final outcome of the investigation may not always be shared. Confidentiality will be maintained, and no action will be taken against any individual who raises a concern appropriately.

The school will not tolerate abuse of this policy. Malicious, false, or deliberately misleading reports, or reports made with the intention of causing harm to others, may result in disciplinary action. Misuse of this policy for defamatory purposes will be sanctioned in accordance with the ISP Disciplinary Policy.

Reviewed by:
Charles John Kelly General Director
Elsa Islas Molinar Designated Safeguarding Lead