HAMILTON
International School

Whistleblowing Policy and Procedure

Vision

Igniting Passion, Purpose and Potential

Mission

Our mission is to develop caring, lifelong learners and global citizens in a culture of excellence through an international, well-balanced education.

Our Core Values



I am Getting Better



Respectful



Resilient



Global Citizen



Communicator



Collaborator



Emotionally Intelligent

Definition of Learning

Learning at Hamilton is the purposeful, personalized process where learners get better in the good struggle zone.

Document Control Table

Status		Public School website
Date Approved		August 2024
Latest Review Date		October 2026
To be Reviewed		October 2027 (annual review)
Linked Documents and Policies		ISP Code of Conduct Child Protection and Safeguarding Policy Grievance Procedure Complaints Policy Disciplinary Procedure ISP Anti-Bribery and Corruption Policy ISP Dignity at Work Policy ISP Confidential Information Policy ISP Whistleblowing and Complaints Framework
Version	**Date**	**Comments**
1.0	Not recorded	Original school policy, adapted from the ISP draft Whistleblowing Policy for Schools.
2.0	October 2026	low-level concerns section added; reporting routes aligned (DSL, Principal, RMD); response timescales, records and data protection, and key contacts added; terminology updated.
2.1	October 2026	scope widened so that anyone, including parents and members of the public, can raise a whistleblowing concern; whistleblowing distinguished from parent complaints and staff grievances; ISP core commitments added; ISP Group

		whistleblowing channel (anonymous option) added; anonymous concerns section updated; publication on the School website added.

Whistleblowing Policy and Procedure

The Hamilton International School, a member of the International Schools Partnership (ISP)

1. Policy Rationale

The International Schools Partnership (ISP) and Hamilton International School are committed to the highest standards of honesty, integrity, transparency, and probity, and to conducting our affairs in a responsible and accountable manner in line with the ISP Purpose and Principles and our school's core values.

A culture of openness and accountability is essential to protect our students, our staff, and our school. We encourage everyone who works with us to report any concern, no matter how small, about potential wrongdoing or perceived danger through the proper channels and as early as possible, so that it can be looked into and resolved. Staff are often the first to notice when something is not right, yet may feel worried about speaking up. This policy exists to make speaking up safe, straightforward, and expected.

In line with the ISP Whistleblowing and Complaints Framework, the School commits that concerns can be raised safely and confidentially, that they are taken seriously, handled fairly, and investigated or resolved appropriately, and that no one suffers retaliation for speaking up in good faith.

2. Aims of the Policy

The aims of this policy are to:

- encourage staff, and anyone else connected with the School, to raise concerns of any level, including low-level concerns, without fear of reprisal;
- reassure everyone who speaks up that their concerns will be taken seriously, investigated appropriately, and handled with respect for confidentiality; and
- explain how to raise a concern and how the Principal and ISP will respond.

3. Scope

This policy applies to all School employees, agency staff, contractors, and volunteers engaged by the School. In line with the ISP Whistleblowing and Complaints Framework, a whistleblowing concern can also be raised by anyone else, including parents and members of the public.

Parents who are personally dissatisfied with a service they have received should use the School's Complaints Policy. Staff, or former staff, with a workplace complaint or grievance should use the Grievance Procedure, unless their complaint relates to their own child who is a

student at the School, in which case the Complaints Policy applies. The whistleblowing routes in this policy are reserved for whistleblowing concerns.

4. What Is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing, such as illegal, unethical, or improper conduct, or risks to the safety of students or staff, that affects others or the wider organization. As the person raising the concern, you may not be directly affected and may have no personal interest in the outcome of any investigation.

Whistleblowing is different from a complaint or grievance. When you raise a grievance, you are saying that you personally have been poorly treated, for example through a breach of your individual employment rights or through bullying, and you are seeking redress for yourself. Personal grievances are not covered by this policy and should be raised under the Grievance Procedure, unless the matter also puts students, colleagues, or the School at risk.

5. Examples of Malpractice

Malpractice covers a wide range of concerns. Matters that should be disclosed include, but are not limited to:

- the physical, emotional, or sexual abuse of students or staff;
- unauthorized use of School funds and/or financial maladministration;
- theft, fraud, bribery, or corruption;
- failure to comply with legal or regulatory obligations, including the laws of the State of Qatar and the requirements of the Ministry of Education and Higher Education;
- endangering an individual's health and safety;
- damage to the environment;
- a criminal offense;
- failure to follow ISP financial regulations, policies, or contract procedure rules;
- showing undue favor to a contractor or a job applicant;
- a miscarriage of justice;
- improper conduct;
- deliberate concealment of information relating to any of the above; and
- concerns about the professional practice or competence of colleagues, other members of staff, or other workers.

Safeguarding comes first. Any concern that a child is at risk of harm, or any allegation that an adult has harmed or may harm a child, must be reported immediately to the Designated

Safeguarding Lead (DSL) in line with the Child Protection and Safeguarding Policy. This policy does not replace or delay that duty.

6. Low-Level Concerns

Low-level concerns are issues or actions that may be smaller in scale or less serious, but still fall within the scope of unethical, improper, or illegal activity. They may not have an immediate or significant impact, but they still need to be addressed to prevent escalation and to maintain ethical standards.

At Hamilton International School, a low-level concern is any concern, no matter how small, even if it is no more than a sense of unease or a "nagging doubt," that a person working in or on behalf of the School or ISP may have acted, or may be acting, in a way that:

- is inconsistent with the ISP Code of Conduct and/or other ISP or School policies; and/or
- does not meet the threshold at which staff feel they should report under the Child Protection and Safeguarding Policy.

Examples of low-level concerns include:

- **Minor policy violations:** failing to follow procedural steps or policy requirements, not documenting actions correctly, or small instances of misreporting that are not significant breaches in themselves but may indicate disregard for ISP or School procedures.
- **Small-scale harassment:** isolated comments or behaviors that do not amount to harassment but are still inappropriate and could contribute to an unhealthy working environment if left unchecked.
- **Lack of transparency:** a minor failure in communication or withholding of information that does not involve major fraud but is still a concern for organizational transparency.

Low-level concerns should always be shared. Small issues that are ignored can lead to more serious ethical breaches or legal violations later on. Sharing a low-level concern is not an accusation; it allows the School to notice patterns early, offer guidance or support, and protect a safe and professional culture. Low-level concerns are raised through the same routes set out in Section 7 and are recorded confidentially.

7. How to Raise a Concern

Raise your concern as early as possible. You do not need firm evidence before speaking up, but you should have reasonable grounds for your concern. You are a witness to events, not the investigator, and it is never too late to share a concern.

Concerns, including low-level concerns, should be raised as follows:

- **Concerns relating to a student or students:** the Designated Safeguarding Lead (DSL).
- **Concerns relating to a member of staff, contractor, or volunteer:** the Principal.
- **Concerns relating to the DSL:** the Principal.
- **Concerns relating to the Principal:** the Regional Managing Director (RMD).
- **Where you suspect the Principal already knows about the malpractice or may be involved in it:** the Regional Managing Director or the Regional Whistleblowing Officer (ISP Regional Head of HR).
- **If you do not feel able to use any of the routes above, for any reason:** report directly to ISP at Group level via whistleblowing@ispschools.com or internationalschoolspartnership.com/whistleblowing. Name, phone number, and email address are optional, so you can report anonymously through this channel.

Contact details for each of these routes, including the ISP Group channel, are set out in Section 15.

Concerns are best raised in writing. Please give as much information as possible, including the full names of the people involved or who know about the matter, the dates and places of events, any relevant documentation, and why you are concerned. This helps the person dealing with the concern focus quickly on the main issues. If you feel unable to put your concern in writing, you may telephone or ask to meet the appropriate contact in person.

8. How the School Will Respond

All concerns will be treated seriously. Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Depending on its nature, the matter may be:

- investigated internally;
- referred to ISP regional or Group leadership;
- referred to the external auditor; or
- referred to the relevant authorities in Qatar, such as the Ministry of Education and Higher Education or the police.

Some concerns raised informally or verbally may be resolved by agreed action without the need for an investigation.

Within ten working days of receiving a written concern, the person handling it will write to you to:

- acknowledge that the concern has been received;
- explain how the School proposes to deal with the matter;
- give an estimate of how long it will take to provide a final response;
- tell you whether any initial enquiries have been made; and
- tell you whether further investigation will take place and, if not, why not.

The person to whom you reported your concern will keep you informed about the progress of the investigation and the action taken, although you may not be told the outcome where this would breach the confidentiality of others. If the investigation leads to disciplinary or criminal proceedings, you may be asked to give a written statement or evidence at a hearing. The Principal will support you through this process and make sure you are clear about what will happen.

When any meeting is arranged, you may choose to be accompanied by a willing colleague of your choice.

9. Protection and Support for the Whistleblower

The School recognizes that deciding to report a concern can be difficult, not least because of the fear of reprisal from those responsible for the malpractice. Harassment, bullying, or victimization of anyone who raises a concern in good faith will not be tolerated and will be treated as a disciplinary matter. Raising a concern does not, however, halt any disciplinary, performance, or redundancy procedures that are already under way.

You may seek confidential advice before raising a concern, including from the School HR Department. The School has no objection to this, provided you maintain confidentiality and do not breach any laws of the State of Qatar, including those relating to defamation and the protection of personal data.

If you believe you have been victimized as a result of raising a concern, report this immediately to the School HR Department, the Principal, or the ISP Regional Head of HR, giving details of how you believe you have been treated and why you think this is connected to your disclosure. It is the responsibility of the School and ISP to ensure that you are not victimized as a result of whistleblowing.

10. Confidentiality

The School understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager. If you ask for your concern to be kept confidential, your

identity will not be revealed without discussing the matter with you first. Please be aware that the investigation process may, in some cases, reveal the source of the information, and you may be asked to give a statement as part of the evidence.

11. Anonymous Concerns

The purpose of this policy is to protect people who make disclosures honestly and in good faith from reprisal or victimization. We understand that identifying yourself can make speaking up feel more daunting, but you are encouraged to put your name to your concern. Anonymous concerns can be harder to investigate and cannot always be followed up with you directly.

Anonymous concerns will still be considered. The decision whether to investigate will be made by the Principal and the Regional Managing Director, taking into account the seriousness of the issues raised, the credibility of what is reported, and the likelihood of confirming it from other sources. Any anonymous concern relating to the safety or welfare of a child will be passed to the DSL without delay. Anonymous reports made through the ISP Group whistleblowing channel (see Section 7) are assessed at Group level and referred to the School or region where appropriate.

12. Concerns Not Raised in Good Faith

No disciplinary or other action will be taken against anyone who raises a concern in the reasonable belief that doing so is in the best interests of our students, staff, or School, even if the concern is not substantiated by an investigation.

The School will not tolerate abuse of this policy. Concerns raised frivolously, maliciously, for personal gain, or in the knowledge that they are 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.

13. Records and Data Protection

Records of concerns, including low-level concerns, together with any enquiries, actions, and outcomes, are kept securely and confidentially, with access limited to those who need it. Safeguarding-related records are held by the DSL in line with the Child Protection and Safeguarding Policy. Records are reviewed periodically so that patterns of concern can be identified and addressed. Personal data is handled in accordance with Qatar's Law No. (13) of 2016 on the Protection of Personal Data Privacy and the ISP Confidential Information Policy.

14. Roles, Responsibilities, and Review

ISP, in partnership with the School, has overall responsibility for the operation of this policy. The Principal is responsible for its day-to-day implementation, for ensuring that concerns are handled in line with it, and for ensuring that all staff, contractors, and volunteers are made aware of it at induction and at the start of each academic year. The Head of QA and Compliance maintains this policy and reviews it annually, or sooner if ISP guidance or the laws of the State of Qatar change. The policy is published on the School website so that parents and members of the public know how to raise a whistleblowing concern.

15. Key Contacts

Role	Name	Contact
Principal	Terry Senior	Tsenior@this.qa
Designated Safeguarding Lead (DSL)	Matt Bennet Jacinth Gurdon Thouraya El Bouz	mbennett@this.qa jgurdon@this.qa telbouz@this.qa
School HR Department	Ashtar Saleh	asaleh@this.qa
Regional Managing Director (RMD)	Kam Bhamra	kbhamra@ispschools.com
Regional Whistleblowing Officer	Rochelle Alphonso, ISP Regional Head of HR	ralphonso@ispschools.com
ISP Group Whistleblowing Channel	ISP Group (name, phone and email optional)	whistleblowing@ispschools.com / internationalschoolspartnership.com/whistleblowing