



The British International School of Sulaymaniyah
IQ010

Complaints and Whistleblowing Policy

July 2024

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1. Overview

1.1 Introduction

The British International School of Sulaimaniyah requires all staff, representatives, employees, volunteers, and consultants to observe high standards of professional and personal ethics in the conduct of their responsibilities.

They are required to adhere to the Code of Conduct and comply with all policies and regulations of The British International School of Sulaimaniyah.

2. Reporting Responsibility

2.1 This Whistleblowing Policy is intended to enable and encourage staff and others to raise concerns internally so that The British International School of Sulaimaniyah can address and correct inappropriate conduct.

2.3 It is the responsibility of all staff, representatives, employees, and volunteers to report concerns about violations of the British International School of Sulaimaniyah's Code of Conduct or suspected violations of laws or regulations.

3. Reporting Procedure

3.1 The British International School of Sulaimaniyah encourages staff to share their questions, concerns, suggestions, or complaints with their immediate supervisor or line manager, depending on the situation.

3.2 If employees consider it problematic to report their concerns to their immediate supervisor or manager, they may send concerns to the Points of Contact laid out below. Alternatively, staff can send their concerns to a team of external Integrity Advisors appointed by The British International School of Sulaimaniyah.

3.3 The Complaints Committee will receive complaints and reports, communicate with whistleblowers, and launch investigations while maintaining strict confidentiality. The Director of the Complaints Committee is responsible for the coordination of investigations, liaising with committee members, and internal and external reporting.

3.3 If staff share their complaints with their immediate supervisor or manager, this supervisor or line manager is required to report the complaints in writing to the Director of the Complaints Committee, who is responsible for investigating and resolving all reported complaints in cooperation with other committee members.

3.4 Whistleblowers have a right to remain anonymous. If they choose to disclose their identity, they have the right to be accompanied by another person of their choosing during any meetings in connection with the complaint, to be advised on all whistleblower support mechanisms available to them, and to be informed of the outcome of any investigation.

4. Handling of Reported Violations

4.1 The Complaints Committee will record details of the complaint within 5 working days of receipt, including:

- The record of the complaint
- The acknowledgment of the complaint
- Any documents supplied by the whistleblower
- Any communication with line managers or Heads of Stages

4.2 The Director will ask the whistleblower for their preferred means of communication and contact details and use these for all communications to preserve confidentiality.

4.3 If the complaint discloses evidence of a criminal offence, it will immediately be reported to the Board of Directors of Maya.

5. No Retaliation

5.1 It is contrary to the values of The British International School of Sulaimaniyah for anyone to retaliate against any staff, representative, employee, or volunteer who, in good faith, reports an ethics violation or a suspected violation of law or the school's policies.

5.2 The British International School of Sulaimaniyah will therefore take appropriate action to protect a whistleblower from any reprisals, harassment, or victimisation. An officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of contract.

6. Acting in Good Faith

6.1 Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which were made frivolously, maliciously, or for personal gain will be viewed as a serious disciplinary offence.

7. Points of Contact and Confidentiality

7.1 Anonymous complaints and whistleblowing reports will not be accepted; all submissions must include the complainant's name.

7.2 All complaints and whistleblowing reports will be handled with the utmost confidentiality.

7.3 The identity of the complainant will be kept confidential and will only be disclosed on a need-to-know basis or as required by law.

7.4 The Complaints Committee will use secure communication channels to receive and discuss complaints to prevent unauthorised access.

7.5 Any documents or evidence related to a complaint will be stored securely and access will be restricted to authorised personnel only.

7.6 The Committee will ensure that the whistleblower's details are anonymised in any reports or records to protect their identity.

7.7 Regular training will be provided to all members of the Complaints Committee on the importance of confidentiality and the measures to maintain it.

7.8 The whistleblower will be informed of the confidentiality measures in place and reassured that their identity will be protected throughout the investigation process.

7.9 For any concerns or reports regarding violations of the Code of Conduct or suspected violations of laws or regulations, please contact: