

Whistleblowing Policy

1. Policy Statement

Dresden International School is committed to acting with honesty and integrity in line with the DIS Values. It expects all staff to maintain high standards in accordance with their contractual obligations and the school's policies and procedures. A culture of openness and accountability is essential to maintain such standards, prevent illegal/unethical situations from occurring, and to address them if they do occur.

2. Policy Rationale

This Whistleblowing Policy explains how the school will meet its obligations concerning the Directive (EU) 2019/1937 of the European Parliament and the German National Law. Both Acts protect whistleblowers against victimization if they make a protected disclosure. Keeping children safe in education also requires statutory duty from schools to provide a mechanism, in which individuals can raise concerns.

3. Scope of Policy

This policy is intended to enable any individual related to the school aware of wrongdoing at DIS related to a person or service to report their concerns immediately, so they can be appropriately investigated by the school's Compliance Officer.

Areas for Reporting: Persons who work for our organization or are in contact with our organization in the context of their work-related activities can report any serious concerns about service provision or the conduct of staff members of the school or others acting on behalf of the school. Whistleblower protection refers to the reporting of wrongdoing related to National or EU law, such as:

- Fraud
- Tax fraud
- Money laundering
- Offences related to public procurement
- Product and transport safety
- Environmental protection
- Public health
- Consumer and child protection
- Data protection

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4. Definitions

The following definitions come from the EU Whistleblowing Directive (Chapter 1, Article 5) and provide clarity for the rest of this policy.

4.1. Breaches: Acts or omissions that are unlawful or defeat the object or the purpose of the rules.

4.2. Information on Breaches: Information, including reasonable suspicions, about actual or potential breaches, which occurred or are very likely to occur in the organization.

4.3. Report: The oral or written communication of information on breaches.

4.4. Internal Reporting: The oral or written communication of information on breaches within a legal entity in the private or public sector.

4.5. External Reporting: The oral or written communication of information on breaches to the competent authorities.

4.6. Public Disclosure: The process of making information on breaches available in the public

4.7. Reporting Person: A person who reports or publicly discloses information on breaches acquired in the context of their work- and/or school-related activities.

4.8. Facilitator: A person who assists a reporting person in the reporting process in a work- and/or school-related context, and whose assistance should be confidential.

4.9. Person Concerned: A person who is referred to in the report or public disclosure as a person to whom the breach is attributed or with whom that person is associated.

4.10. Retaliation: Any direct or indirect act or omission which occurs in a work-related context, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person

4.11. Follow-up: Any action taken by the recipient of a report or any competent authority, to assess the accuracy of the allegations made in the report and, where relevant, to address the breach reported, including through actions such as an internal enquiry, an investigation, prosecution, an action for recovery of funds, or the closure of the procedure.

4.12. Feedback: The provision to the reporting person of information on the action envisaged or taken as follow-up and on the grounds for such follow-up.

4.13. Competent Authority: Any national authority designated to receive reports and give feedback to the reporting person, and/or designated to carry out the duties provided for in the EU Whistleblowing Directive.

5. Roles & Responsibilities

5.1. Compliance Officer Responsibilities:

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- ❑ In collaboration with school stakeholders, create a system and process for the implementation of the EU Whistleblowing Directive, including a communications strategy.
- ❑ Monitor operational processes and procedures using a compliance management system.
- ❑ Support School Directors in conducting compliance risk assessments and identifying strategic areas of development.
- ❑ Train and educate staff about compliance frameworks and guidelines the school uses.
- ❑ Act as contact person and confidential liaison between staff and School Directors in the event of whistleblower disclosures.

5.2. Whistleblower Responsibilities:

- ❑ Report in a timely manner accurate and factual information relating to whistleblowing concerns through one of the three channels. See Responsibilities of the School (6.9).

6. Protocols

6.1. Whistleblowers as Described the Directive: The EU Directive describes that persons who work for a public or private organisation or are in contact with such an organization in the context of their work-related activities are often the first to know about threats or harm to the public interest which arise in that context, and can act as whistleblowers. In a school context, this includes for example, board members, current and former staff, contractors, parents, or external partners.

6.2. Report Submission: One of the fundamental aspects of the EU Directive is the three-tier reporting structure. Whistleblowers can use the following to create and submit a report:

Internal Channels

These reports:

- Are submitted via a confidential reporting tool or a written letter of concern directly to the Compliance Officer, for example via post, handed directly to the Compliance Officer or put in their internal mail box on campus
- Must be kept confidential
- Must be acknowledged within seven days and responded to within three months

External Channels

These reports:

- Are directed to competent authorities established by each Member State
- Must be dealt with within three months (or within six months in justified cases)

Public

These reports:

- Are shared with outlets, such as the media
- May involve an imminent danger to the public interest, a risk of retaliation, or a failure to deal with concerns internally

DIS encourages individuals to raise concerns first via internal channels, stressing the confidentiality of these reports and the school's support. There is no hierarchy or order of

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operations with these three reporting methods. Whistleblowers will be protected by the EU Directive regardless of their chosen route.

6.3. Whistleblowing Protections: DIS is committed to good practice, high standards, and supporting every individual who reports. The school recognizes that the decision to report a concern can be a difficult one to make. If the whistleblower honestly and reasonably believes the reported matter is true, the whistleblower should have nothing to fear because they are acting according to their duty

The school will not tolerate any harassment or victimization of a whistleblower (including informal pressures). Based on the nature of the concern, it will take appropriate action.

6.4. Support Mechanisms: Throughout the process to submit a report:

- Whistleblowers will be given full support from SLT
- The whistleblower's concerns will be taken seriously; and
- The school will act in its fullest capacity to support the whistleblower through the investigation
- If appropriate, the school will consider temporarily re-deploying you for the investigation period
- The school will endeavor to provide appropriate advice and support wherever possible for those who are not school employees.

6.5. Confidentiality: All concerns will be treated in confidence, and every effort will be made not to reveal the whistleblower's identity if that is the wish. Depending on the nature of the investigation, taking action without the whistleblower's help may not be possible, so the whistleblower may be asked to come forward as a witness.

6.6. Anonymous Allegations: By providing an appropriate internal reporting channel, the school ensures that all reports can be made anonymously. Despite the anonymity, the school may contact the whistleblower for further information or clarification to assist an investigation.

6.7. Untrue Allegations: If an allegation is made in good faith and reasonably believed to be accurate, but the investigation does not confirm it, the school will recognize the concern, and the whistleblower will have nothing to fear. If, however, an allegation is made frivolously, maliciously, or for personal gain, appropriate action that could include disciplinary action may be taken.

6.8. Raising Concerns: In principle, the three channels are open to every whistleblower. For internal reports, a confidential digital reporting tool is available. Alternatively, individuals can give a written letter of concern directly to the Compliance Officer. Depending on the concern, the whistleblower may choose to directly contact individuals responsible for specific areas of school practice, e.g. Data Protection Officer for data protection issues.

6.9. Responsibilities of the School: Each report completed via the internal confidential reporting tool is first received by the Compliance Officer. Messages or communication received via other internal channels will be addressed by the respective addressee, e.g. SLT. Following the EU Directive requirements, reporting and follow-up procedures must do the following:

- Protect the confidentiality and privacy of the whistleblower and any third party mentioned in whistleblowing reports
- Restrict access to the report, allowing only authorized staff members
- Acknowledge receipt of the report within seven days

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- Allow for diligent and impartial follow-up, communication, and feedback – including for confidentially submitted reports – within three months of the report’s submission
- Allow the whistleblower to review, approve, and edit the initial report and subsequent interview notes
- Provide clear information on external reporting options
- Follow up on allegations to ensure their veracity and close any reports with false allegations in a timely manner

A fundamental principle is that checking a concern for plausibility is not the same as either accepting or rejecting it. The overriding principle for the school will be the public interest. To be fair to all individuals, including those who may be wrongly or mistakenly accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The investigation may need to be carried out under strict confidentiality, i.e., by not informing the subject of the complaint until (or if) it becomes necessary. In some instances, however, such as allegations of ill-treatment of others, suspension from work may be considered to safeguard those involved. The protection of others is paramount in all cases. The school will inform the Works Council if an employee's rights are affected.

Where appropriate, the matters raised may:

- Be investigated by school leadership;
- Be referred to the police;
- Be referred to an external auditor;
- Be referred to the Local Authority and put through established child protection/abuse procedures;
- Form the subject of an independent inquiry.

Within ten working days of a concern being raised, the person investigating the concern will give feedback:

- Acknowledging that the concern has been received;
- Indicating how the School proposes to deal with the matter;
- Supplying the whistleblower with information on support mechanisms;
- Informing whether further investigations will take place, and if not, why not.

Safeguarding concerns will be addressed in line with the school’s safeguarding policies. Whistleblowers will likely be interviewed to ensure that the disclosure is fully understood. This is possible confidentially via the internal reporting tool or a written letter of concern can be directly given to the Compliance Officer. Any in-person meeting can be arranged away from the workplace. The whistleblower needs to be assured that the disclosure has been appropriately addressed. Unless there are any legal reasons why this cannot be done, the whistleblower will be kept informed of the progress and outcome of any investigation.

6.10. Escalation of the Concern: This policy is intended to allow potential whistleblowers within the school to raise their concerns. The school will always strive to take the proper action. If, in the opinion of the whistleblower, this is not the case in any instance, reporting channels are available outside the school. No confidential information should be disclosed to the school or anyone else, such as customers or contractors of the school, except to the appropriate parties to resolve a reported matter.

This policy does not prevent you from seeking your own legal counsel.

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6.11. GDPR and Privacy: The school will ensure that GDPR compliance is upheld throughout the whistleblowing process.

6.12. Self-Reporting: Self-reporting is recommended in cases where an individual may have intentionally or unintentionally participated in an area of concern (see Scope). Depending on the concern, the individual may choose to directly contact individuals responsible for specific areas of school practice, e.g. Data Protection Officer for data protection issues.

7. Policy Review

This policy will be reviewed annually, as well as, when there are significant changes in the jurisdiction. This policy was last updated in December 2023.

8. Associated Policies

Data Privacy and Protection Policy

Data Retention Policy

Child Protection Handbook

[Safeguarding Code of Conduct](#)

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