

## Introduction

A “Whistle blower” is a person who raises a genuine concern, in good faith, any issue concerning health and safety, illegality, child protection, bad practice or any other issues of a detrimental nature to TAMOS Education international’s working practices, reputation, pupils or staff. TAMOS Education encourages the school to have a culture of transparency and openness where discussion and feedback is encouraged and leads to positive affects to pupils, parents and staff alike.

As an educational community, TAMOS Education is committed to the highest standards of individual and professional conduct and the school management openly encourages approachability, open discussion and reflective practice but we also respect the concept of confidentiality and the circumstance in which confidentiality may be necessary.

TAMOS Education has introduced this whistle blowing policy to enable every person and stakeholder engaged in TAMOS Education to raise concerns internally with the management and administration in a completely confidential manner. This includes parents, students, staff, contractors’ volunteers and visitors. These concerns could include but are not limited to acts committed by fellow members of staff, students, administration, unethical conduct, faults in school procedure, oversights or dangerous issues with health & safety that need to be addressed. TAMOS Education encourages and values all members of staff, students and any stakeholders of the school that bring up such issues.

If any person has a concern in relation to a child protection issue, then they should refer to the child protection policy which sets out the best procedure for following up such concerns.

## Qualifying disclosures

A “Qualifying Disclosure” is a disclosure made in the public interest by an employee raising legitimate concerns about specific matters that is being or likely to be committed Examples of these act are as follows:

- Committing an act against Kazakh law;
- An act creating a risk to health and safety;
- Causing damage to school property or the environment;
- A breach of any legal obligation of the school by an individual;
- A breach of the Kazakh data protection act;
- An act against a student that is unreasonable and likely to cause emotional or physical danger;
- Acts of sexual or abusive inappropriateness;
- Any action that may put other people at risk;
- Concealment of any of the above.

It is not needed for the member of staff to have absolute proof that such acts are being, has been or is likely to be enacted, a reasonable belief or suspicion is sufficient as the event may be an oversight rather than a deliberate act. The member of staff has only the responsibility to report such an act, the responsibility of investigating the issue is with the school directors and the General Director. On no account should the discloser directly approach or accuse an individual about whom they have concerns.

A member of staff that makes such a disclosure will be protected from dismissal, and not subject to any detrimental treatment, victimization, bullying, or negative treatment after making a disclosure. No member of staff should suffer any detrimental effects for reporting a wrong doing as long as long as the whistle blowing policy is used correctly. Failure to follow the policy may make the disclosure unreasonable and protection given to the member of staff through this procedure may be lost.

People, parents or students who make malicious, vexatious, or frivolous false allegations will be dealt with under TAMOS Educations disciplinary procedure.

If a person is not sure whether to make a discloser, they may raise the issue with any of the administration, general director or school directors they should discuss the issue informally before deciding whether to make an official disclosure.

A record of all such allegations should be kept by the general director or school directors and should be reviewed end of the year.

### Principles

The key principles under which the “Whistle blowing Policy” operates under are:

- TAMOS Education does not tolerate malpractice.
- All staff share the responsibility of eradicating malpractice.
- Staff should be watchful at all times for illegal and unethical conduct and report it accordingly
- Respect the confidentiality of all staff.
- Investigation of any conduct under this policy will be conducted under TAMOS Education disciplinary rules.
- Any involvement of external organization will be at the discretion of the general Director.
- There should be no agreement to for managers to keep silent about such issues as this act in itself is an offence.

### Policy distribution

All staff will be given a copy of the whistle-blower policy in the teacher’s handbook at their induction. Copies will also be found on the school web site the parent’s handbook, and a copy will be given by the administration on request.

### Malpractice

Malpractice is not always easily defined. However, malpractice can include but is not limited to:

- Safeguarding concerns;
- Allegations of fraud;
- Financial irregularities;
- Mismanagement;
- Bribery and corruption;
- Dishonesty;
- Negligence;
- Abuse or bullying of staff or students;
- Acting contrary, the staff and school code of ethics;
- Criminal activities;
- Failing to comply with legal obligations;
- Creating or ignoring a serious risk to health;
- Unauthorized disclosure of private information;
- A miscarriage of justice;
- Safeguarding issues;
- Conduct that could damage the school’s reputation.

### Making a Disclosure

The whistle blowing policy is independent from the staff grievance policy. Members of staff should use this policy when they have a personnel grievance not the whistle blowing policy.

Casual or informal concerns can be raised verbally; though staff are encouraged to document their concerns in writing. The report should include:

- Background and history of the concern;
- Relevant names and places;
- Relevant dates;
- Reason for the concern.



People make a disclosure will be kept informed of progress and whenever possible subject to issues of confidentiality, the data protection act and the rights of third parties informed of the resolution. The reporter has the right to escalate their concerns to another stage or contact the relevant external body if:

- They are not satisfied their complaint is being dealt with;
- They do not receive a response within seven days;
- Extreme circumstance dictate.

Complainants are not expected to prove the truth of the allegations; however, they are required to demonstrate that there are sufficient grounds for concern. Any genuine concern raised will be investigated according to this policy and in a timely manner.

### Procedure

#### Stage 1

Initial formal concerns should be made to one of the following:

- Principals;
- Councillors;
- Vice Directors;
- Directors;
- General Director.

The complainant should receive a response within seven days. If the complaint refers to any of the above position the complainant may go directly to the General Director or the school directors.

#### Stage 2

If no response is received after seven days and the complainant is not confident the complaint is being dealt with, they should notify the next manager up the chain of command. Again, they should receive a response in seven days.

#### Stage 3

If still no response they should go directly to the general director or the school directors.

#### Stage 4

If after exhausting all internal procedures set out in this policy and the complaint is still not dealt with satisfactorily, the situation can be considered an “extreme circumstance” and the complainant may contact the relevant outside agency for help.

#### Extreme circumstances

Extreme Circumstances can be defined as a situation where, after careful thought, with all internal recourses have been exhausted and when either:

- an illegality has been committed or is about to be committed;
- it is felt the school is covering an illegality;
- There is immediate danger to students, staff or anyone involved in the college;
- Somebody may destroy any relevant evidence;
- Where somebody may be victimized or will suffer unnecessarily.

#### Media or commercial Bodies

The principles of confidentiality should be observed at all times. The complainant, should under no account approach the media or a commercial body with details of the suspected wrongdoing. If the complainant approaches such a body to disclose their concerns it will be considered to be a gross act of misconduct and immediate disciplinary action may be taken against the member of staff.

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