

4.05.17 WHISTLEBLOWING: REPORTING A SUSPECTED VIOLATION

Approved on February 6, 2015, Amended on May 30, 2016

The school has adopted this policy on whistleblowing to enable members of the staff and other school stakeholders to report suspected violations in a confidential manner regarding accounting, financial statement disclosures, internal controls, auditing matters, fraud, malpractice, health and safety violations, criminal offences, sexual harassment, miscarriages of justice, failure to comply with legal obligations or unethical conduct. The policy also provides for such concerns to be raised from outside the organization, including prospective members of the Association and/or members of the public.

Reporting Responsibility

It is the responsibility of all staff to comply with the policy and to report violations or suspected violations, including those relating to accounting, financial statement disclosures, internal controls, auditing matters, fraud, malpractice, health and safety violations, criminal offences, sexual harassment, miscarriages of justice, failure to comply with legal obligations or unethical conduct, in accordance with this Whistle Blowing Policy.

No Retaliation

No person who in good faith reports a violation of such nature shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline, including termination of employment. This Whistle Blowing Policy is intended to encourage and enable employees and others to raise serious concerns within the school rather than seeking resolution outside the school.

Acting in Good Faith

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 amounts to a violation. Any allegations that are not substantiated (by a material basis or evidence) and which prove to have been made maliciously or knowing to be false will be viewed as a serious disciplinary offence.

This policy provides a specific mechanism:

- to receive, investigate and resolve suspected violations
- to protect persons reporting suspected violations
- to document reports and maintain confidential records of violations

Reporting and investigating: issues of misconduct should be **reported to the Board of Governors Chair**. The concern will be investigated thoroughly and in a timely manner and appropriate corrective action taken if warranted by investigation. The party making the allegation will be kept informed of progress and informed of the resolution wherever possible. A person reporting a matter who is not satisfied that their concern is being properly dealt with will have the right to raise it in confidence to the Board of Governors. **The Board of Governors will respond within 7 days.**

Any ACST member of Staff, other stakeholder or outside party with a concern or complaint regarding a suspected violation may submit their concern or complaint by any of the following methods:

1. Verbally to the Board Chairman
2. By email to the Board Chairman - ACSTboardchairman@gmail.com
3. By sealed mail to:

Chairman Board of Governors
American Cooperative School of Tunis
BP 150 Cite Taieb M'hiri
Laouina 2045, Tunisia

The Chairman will maintain your anonymity unless you agree otherwise in writing.