



加拿大加皇國際教育集團

AKD International Inc.

AKD CIS Beijing Whistleblower Policy

AKD CISB Whistleblower Policy Policy No: **CISB15**

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AKD International Inc.

SCHOOL MISSION

Developing Learners into Passionate Leaders

SCHOOL VISION

Compassionate

Inquisitive

Successful

Balanced

SCHOOL VALUES

Community

Integrity

Resilience

Respect

Trust

SCHOOL MOTTO

Together is Better!





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Whistleblower Policy

This policy applies to the whole school. All who work, volunteer or supply services to our schools have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school.

Our approach at CISB is child-centered, and we will always act in the best interests of the child.


CISB is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, employees, and others with serious concerns about malpractice or wrongdoing in the school's work are encouraged to come forward and voice those concerns without fear of victimization.

Whatever the source, the Board of Directors are committed to listening to the concerns, taking them seriously and ensuring that they are dealt with promptly and fairly.

We explicitly require staff to report to the Head of School, Director of Operations, or the Board of Directors any concern or allegation about school practices or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm.

'Whistleblowing' is the confidential raising of problems or concerns within an organization by a member of staff. This is not 'leaking' information but refers to matters of impropriety, e.g., a breach of law, school procedures or ethics. Whistleblowing is not the raising of a grievance within the school (which would be dealt with under the *Faculty Handbook* and the staff *Professional Code of Conduct* contained therein).

Those external to CISB are encouraged to raise any concerns they have about the way in which the school operates. Employees are often the first to realize that there may be something seriously wrong within an organization. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organization. They may also fear harassment or victimization.





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Employees are encouraged in the first instance to raise their concerns within the school by applying the approach described in this document, rather than overlooking a problem or blowing the whistle outside the organization.

The school provides immunity from retribution or disciplinary action against staff for 'Whistleblowing' in good faith. At all levels staff will be given safeguarding briefings or training on how to respond to suspicions or allegations of abuse and what action they should take in response to such suspicions or allegations.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by the school, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Staff are expected to report concerns within the organization rather than air their complaints outside the school.

The key situations of whistleblowing include:

- criminal offences, such as fraud or corruption
- risks to student or staff health and safety
- failure to comply with a legal obligation or statutory requirement
- breaches of financial management procedures
- a miscarriage of justice
- environmental damage

A whistle-blower is a person who raised a genuine concern relating to the above.

Not all concerns about the school count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a faculty or staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When faculty or staff have a concern, they should consider whether it would be better to follow our grievance procedure.

Purpose and Scope of Policy

The purpose of this policy is to:



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- encourage staff to feel confident in raising serious concerns and to question and act upon concerns and poor practice
- provide an avenue for staff to raise those concerns and receive feedback on any action taken
- ensure that staff would receive a response to their concerns and that the member of staff is aware of how to take the matter further if they are not satisfied with the response
- reassure staff that they will be protected from reprisals or victimization for any disclosure that have been made in good faith
- cover any serious concerns that staff have about any aspect of service provision or the conduct of a member of staff or others acting on behalf of the school, or major concerns that fall out of the scope of other procedures.

There are existing procedures in place (e.g., grievance, harassment, and bullying) which make provision for employees to lodge a concern relating to their employment. This whistleblowing policy is intended to complement those procedures by covering concerns that appear to fall outside the scope of those existing procedures.

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or other workers who provide services to the trust in any capacity including self-employed consultants or contractors who provide services on a personal basis and agency workers.

Procedure

How to raise a concern.

1. In the first instance, an employee should raise concerns with their immediate administrator, and this should be made in writing whenever possible.
2. If an employee believes that their line manager is involved in the situation, the employee should approach the Head of School and/or the Director of Operations without delay.
3. If an employee believes that the Head of School or Director of Operations is involved in the situation, the employee should approach the Chair of the Board of Directors



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4. Employees are encouraged to set out in writing the background and history of the concern, giving names, dates, and places where possible and the reason why they are concerned about the situation, providing as much evidence and context as possible.
5. If employees do not feel able to put their concern in writing the matter can be raised by telephone or a face-to-face meeting with the appropriate administrator.
6. In any event, employees should make an immediate note of relevant details, e.g., what was said in a telephone or other conversation, dates, times and so on.
7. Employees are encouraged to express their concerns at the earliest opportunity. The earlier a concern is raised, the easier it may be to act.
8. When raising concerns employees must declare any personal interest they have in the matter.
9. Although employees are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for a concern.
10. Employees should not attempt to investigate a concern or accuse individuals directly.
11. If the concern is accepted in line with this policy, an investigating officer (IO) will be appointed by the Head of School.
12. Once the appointed IO is in receipt of the information or allegation, they will carry out a preliminary investigation on a sensitive and confidential basis.
13. The IO will meet with the person raising the concern within a reasonable time.
14. The IO will gather as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the employee should handle the concern in line with the appropriate policy/procedure; and the IO will reiterate, at this meeting, that the employee is protected from any unfair treatment or risk of dismissal because of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.
15. The IO will seek to establish the facts of the matter and assess whether the concern has foundation and can or should be resolved internally.



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16. The preliminary investigation may identify the need to involve third parties to provide further Information, advice, or assistance.
17. The action taken by the school will depend on the nature of the concern. The matters raised may be investigated internally, be referred to the Police, be referred to an external auditor; and form the subject of an independent enquiry.
18. The IO, senior administrator (if the issue is being dealt with informally), Head of School, and/or the Director of Operations will write to the employee who has raised the concern within 10 working days, to acknowledge that the concern has been received; indicate how they propose to deal with the matter; and as able, offer an estimate of how long it will take to provide a response.

Initial enquiries will be made to decide whether an investigation is appropriate and if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (e.g., safeguarding, code of conduct issues or financial irregularities) will usually be referred for consideration under those procedures and/or policies.

Some concerns may be resolved by informal action agreed between the employee raising the concern and the person to whom it is reported without the need for formal investigation.

Records will be kept of work undertaken and actions taken throughout the investigation. The IO will consider how best to report the findings and will make recommendations on any required corrective action. This may include disciplinary action and/or third-party referrals such as the police.

Recommendation or actions taken should be discussed at the Senior Leadership Team meetings unless there is good reason not to do so such as confidentiality. The Head of School and/or the Director of Operations, and/or Director of Human Resources should ratify any recommendations made regarding disciplinary action.

Employees raising concern will be informed of the outcome of any investigation, as able. In some circumstances, it may not be possible to reveal the full details where this relates to personal issues.

If the whistle-blower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns may be raised with the Chair of the Board of Directors.



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Safeguarding the Employee

Protection: This policy is designed to offer protection to those employees of the school who disclose such concerns provided the disclosure is made in good faith; and in the reasonable belief that the disclosure tends to show malpractice or impropriety and if they make the disclosure to an appropriate person.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to follow procedure or protocol. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

The school will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information, and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the school. In exercising this discretion, the factors to be considered will include the seriousness of the issues raised, the credibility of the concern; and the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure, the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and if they persist with making them, disciplinary action may be taken against that individual.



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Monitoring

All concerns raised under this policy will be recorded in strictest confidence together with the outcome in a register held by the Proprietors in the Head of School's office. The purpose of this record is to ensure that a central record is kept which can be cross-referenced with other concerns raised to monitor any patterns and to assist in monitoring and reviewing the policy.



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Terminology

Harassment: A person is harassed when they are subjected to unwelcome physical or verbal conduct, or coercive behaviour which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Bullying: A person is bullied when they are subjected to offensive, intimidating, malicious or insulting behaviour which through the abuse or misuse of power makes them feel vulnerable, upset, humiliated, or threatened. Such behaviour may include a staff member shouting at, being sarcastic towards, ridiculing or demeaning a student or colleague, making physical or psychological threats; overbearing supervision; making inappropriately derogatory remarks about a student or colleague; persistent unfair assessment of a student or colleague's work; unfairly excluding students from classes, projects, or events; and excluding colleagues from events and conversations. Bullying does not include reasonable and constructive criticism of a student or colleague's work or behaviour.



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举报人政策

这项政策适用于全校。所有在我们学校工作、做志愿者或提供服务的人都有平等的责任理解和执行这项政策及其程序，无论是在正常的学校时间内还是在学校以外的时间，包括在学校以外的活动。

我们在 **CISB** 的做法是以儿童为中心，我们将始终以儿童的最佳利益作为行动指南。 **CISB** 致力于尽可能高的公开、诚实和问责标准。根据这一承诺，鼓励员工和其他对学校工作中的不当行为或错误做法感到严重担忧的人挺身而出，表达这些担忧，而不必担心成为受害者。

无论出自何方，董事会都致力于倾听、认真对待这些关切，并确保它们得到迅速和公平的处理。

我们明确要求教职员工向学校校长、运营总监或董事会报告任何针对学校做法或同事行为的关切或指控，这些行为可能会使学生面临虐待或其他严重伤害的风险。

“举报”是指员工秘密地在组织内提出问题或顾虑。这不是“泄露”信息，而是指违反法律、学校程序或道德规范的不当行为。举报并不是在学校内部提出申诉 (这将根据《教职员工行为准则》处理)。

鼓励 **CISB** 以外的人提出他们对学校运营方式的任何担忧。员工往往是第一个意识到组织内部可能存在严重错误的人。然而，他们可能不会表达他们的担忧，因为他们觉得说出来会对他们的同事或组织不忠诚。他们也可能害怕骚扰或受害。

我们鼓励员工首先通过应用本文档中描述的方法在学校内提出他们的担忧，而不是忽视问题或在组织外告发。



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学校对善意“告密”的教职员工提供免于惩罚或纪律处分的豁免权。将向各级工作人员提供关于如何对虐待的怀疑或指控作出反应以及他们应对这种怀疑或指控应该采取何种行动的安全情况通报或培训。

应该强调的是，这项政策旨在帮助那些认为他们发现了不当行为或错误做法的个人。它不是为了质疑学校的财务或商业决定，也不应该用来重新考虑任何已经通过骚扰、投诉、纪律或其他程序解决的问题。工作人员应该在组织内部报告担忧，而不是在学校之外表达抱怨。

举报的关键情况包括：

- 破坏环境
- 诈骗或腐败等刑事犯罪
- 针对学生或教职员工健康和安全的风险
- 未能遵守法律义务或法定要求
- 违反财务管理程序
- 司法不公
- 破坏环境

举报人是指对上述问题提出真正关切的人。

并不是所有对学校的担忧都被算作举报。例如，员工的个人不满，如欺凌或骚扰，通常不算举报。如果某件事影响了教职员工个人，或者与个人的聘用合同有关，这很可能是一种申诉。

当教职员工有顾虑时，他们应该考虑遵循相关的申诉程序是否会更加适合。

政策的模式和目的

这个政策的目的是：

- 鼓励员工有信心提出严肃的问题，并对担忧和不良做法提出质疑并采取行动。



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- 为员工提供提出这些问题并接收有关采取行动的反馈的途径。
- 确保工作人员能够收到对其关切的答复，并确保工作人员知道如果对答复不满意如何进一步处理此事。
- 让员工放心，他们将受到保护，不会因善意披露的任何信息而受到报复或者伤害。
- 涵盖员工对服务提供的任何方面或员工或代表学校行事的其他人的行为的任何严重问题，或不属于其他程序范围的重大问题。

现有程序（例如申诉，骚扰和欺凌）为员工提出与其就业有关的疑虑提供了规定。该举报政策旨在通过涵盖似乎不属于这些现有程序范围的问题来补充这些程序。

本政策不构成任何员工雇佣合同的一部分，并可随时修改。该政策适用于以任何身份向学校提供服务的所有员工或其他工作人员，包括以个人身份提供服务的自雇顾问或承包商以及代理工作人员。

程序

如何提出疑问

- 1) 首先，员工应该向其直接管理员提出疑问，并且应该尽可能以书面形式提出。
 - 如果员工认为其直线经理与该情况有关，该员工应该立即联系学校校长和/或运营总监。
 - 如果员工认为校长或者运营总监与该情况有关，该员工应该立即联系董事会主席。
 - 鼓励员工以书面形式阐述问题的背景和历史，尽可能提供姓名，日期和地点，以及他们担心该情况的原因，并提供尽可能多的证据和背景。
 - 如果员工无法以书面形式表达他们的疑虑，可以以电话或者面对面的与适当的管理者面谈的形式提出来。
 - 无论如何，员工应立即记下相关细节，例如电话或其他谈话中所说的内容，日期，时间等。
 - 鼓励员工尽早表达他们的担忧，越早提出担忧，采取行动就越容易。
 - 提出疑问时，员工必须声明他们在此事中拥有的任何个人利益。
 - 尽管员工不需要证明指控的真实性，但他们需要向联系人证明有足够的理由提出疑虑。
 - 员工不应试图调查问题或直接指控个人。



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- 2) 如本政策内关注的内容被接受，大校长将会指派一名调查人员 (IO)。
- 3) 一旦被指派的调查人员获得相关资料或指控，他们将在敏感和保密的基础上进行初步调查。
- 4) 调查人员将在合理时间内与提出问题的人见面。
 - 在此次会议上，调查人员将尽可能多的收集该事件的信息并记录下来。如发现问题明显不属于举报性质，员工应按着适当的政策/程序处理该问题；
 - 调查人员将在此次会议上再次强调，提出问题的员工将受到保护，不会因提出这一问题而受到任何不公平待遇或面临被解雇的风险。如果该问题是恶意提出或无理取闹的，则可能采取纪律行动。
- 5) 调查人员将寻求问题的真实情况，并评估该问题是否有根据，是否可以或应该在内部解决。
- 6) 初步调查可能会确定需要第三方提供的进一步信息、建议或帮助。
- 7) 学校采取的行动将取决于问题的性质。所提出的问题可能会在内部进行调节，转介警方，或转介给外部审计员，并进行独立调查。
- 8) 调查人员，高层管理人员（如有关事件正以非正式方式处理），学校大校长和/或运营总监将在 10 个工作日内写邮件给提出相关问题的员工，确认已收到该问题；说明他们打算如何处理此事；并尽可能提供答复该问题所需要的时间。

将进行初步询问，以确定进一步调查是否适当，如适当，将采取何种形式调查。属于特定程序范围内的关注或指控（如保障、行为准则问题或财务违规行为）通常会根据这些程序/政策进行考虑。

一些问题可以通过提出问题的员工和被报告对象之间达成的非正式行动来解决，无需进行正式调查。



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整个调查过程中所进行的工作和采取的行动将会被记录。调查人员将考虑如何以最佳方式报告调查结果，并就所需纠正的行动提出建议。这可能包括纪律处分和/或转介第三方，如警方。

管理层会议上将会讨论提出的建议或采取的行动，除有需保密或其他充分的理由不这样做的情況下。有关纪律处分的任何建议，需经过大校长和/或运营总监和/或人力资源主管批准。如有可能，提出质疑的员工将被告知任何调查的最终结果。如涉及到个人问题，可能不会透露全部细节。

如果举报人对调查的进行或事情的解决方式感到不满，或担心提出的问题没有得到妥善处理，可以向董事会提出疑虑。

保护员工

保护：本政策旨在保护那些为披露此类问题的学校员工，前提是他们的披露是出于善意，在按规定向适当人员进行披露时，该员工须有充分理由相信该披露涉及了不当行为或不合规行为。

必须指出的是，对于那些选择不遵守程序或规定的人员，学校不提供内部纪律程序方面的保护。在极端情况下，恶意或疯狂的指控可能会导致被投诉者采取法律行动。

保密：学校将以保密和敏感的方式处理所有此类披露。只要不妨碍或阻挠任何调查，提出指控的员工身份可以保密。但是，调查过程可能会暴露信息来源，披露信息的员工可能需要提供一份声明，作为所需证据的一部分。

匿名指控：本政策鼓励员工实名披露任何事件。匿名表达的问题具有较低的可信度，但学校也可酌情考虑。在行使这一自由裁量权时，要考虑的因素包括所提出问题的严重性、所关注问题的可信度，以及从可归属来源证实指控的可能性。

不实指控：如果员工出于善意提出指控，但随后的调查并未证实，则不会对其采取任何行动。在进行披露时，员工应适当谨慎，以确保信息的准确性。但是，如果员工提出恶意或无理取闹的指控，并且如果他/她仍坚持指控，则可能会对该员工采取纪律处分。

监督：在本政策下提出的所有问题都将严格保密，并将其与结果记录在由校长办公室保管的登记簿中。该记录的目的是确保保存一份中央记录，可与其他提出的问题相互参照，以监测任何模式，并协助监测和审查该政策。



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术语

骚扰：骚扰是在他人非自愿的情况下通过身体或语言行动进行冒犯或侮辱的行为，其目的或效果是侵犯他人尊严或制造一个令人感到恐吓、敌对、贬低、羞辱或冒犯的环境。

欺凌：当一个人遭受到冒犯、恐吓、恶意或侮辱性的行为，对方通过滥用权力使其感到脆弱、沮丧、羞辱或受到威胁时，就可以称之为欺凌。这种行为可能包括员工对学生或同事大声喊叫、讽刺、嘲笑或贬低，进行身体或心理威胁；过度监督；对学生或同事发表不恰当的贬损性言论；持续对学生或同事的工作进行不公平评估；不公平地将学生排除在课堂、项目或活动之外；以及将同事排除在活动和谈话之外。欺凌不包括对学生或同事的工作或行为提出合理的建设性批评。