



## WHISTLE BLOWING POLICY

### What is a “whistleblower”?

A whistleblower is an individual who reports certain types of wrongdoing, typically some form of dangerous/ illegal activities or malpractice that may have happened in the past, is happening now or about to happen, according to the whistleblower’s opinion. The whistleblower does not need to be correct about the disclosed concerns but provided with reasonable grounds for believing that the information/allegation disclosed are substantially true.

### Scope of Policy

This policy is designed to enable all individuals working at all levels and grades, including senior leadership team (SLT), directors, officers and all employees (whether permanent, fixed-term or temporary), board members, students, consultants, contractors, trainees, volunteers, interns, sponsors, casual workers, self-employment workers working for Bethlehem Bible College (BethBC), and all other persons associated with and acting for BethBC, whether directly or indirectly, besides external members of BethBC committees, representatives, agents, subsidiaries, individuals appointed as consultants, contractors and partners to raise concerns or disclose information at a higher level which the individual believes shows malpractice. This policy is intended to cover concerns which are in the public interest at first place.

This policy aims to explain what whistleblowing is, describe protections afforded to whistleblowers and set out the whistleblowing process.

SLT in alignment with the HR Manager are responsible for making all relevant people aware of these procedures.

### Purpose

BethBC encourages individuals with serious concerns to come forward and voice those concerns. This also applies to concerns about the activities of all BethBC stakeholders in their dealings with the college.

Staff members may be the first to spot anything that is seriously wrong within the college. However, they might not say anything because they think this would be disloyal, or they might be worried that their suspicions are not justified. They may also be worried that they or someone else may be victimised.

At BethBC, we are committed to being open, honest and accountable and this policy aims to make sure that if anyone wants to raise any concern, it is done with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

### **What types of action are covered by the policy?**

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following.

- Fraud and corruption
- Children or students being mistreated (Or any other of BethBC beneficiaries)
- Unauthorized use of public money
- An unlawful act
- Any danger to health and safety
- The environment being damaged (for example, by pollution)
- A person abusing their position or any unauthorised use of their position for personal gain
- A person deliberately not keeping to any of BethBC policies, an official code of practice, any law or regulation, or any procedures agreed by the local authority or governing body (Example: The Ministry of Labor)
- A person failing to meet appropriate professional standards
- A person being discriminated against because of their race, color, religion, ethnic or national origin, disability, age, sex, sexuality, class or home life

### **Responsibility for the policy**

The whistleblowing officer (WBO)/ HR Manager has day to day operational responsibility for this policy.

The WBO is Razan Kutlo, Admin & HR Manager at BethBC. If the WBO is unavailable or absent, the Director of Administration, Dr. Jihan Nazzal may act as WBO.

BethBC Board of Trustees (BoTs) is responsible for issuance approval of this policy. Furthermore, they have the responsibility of reviewing this policy every two years or upon necessity.

### **What is not covered?**

This policy cannot be used to deal with serious or sensitive matters that are covered by other procedures. Such procedures include the following:

Staff's complaints about any sexual behavior, such complaints are dealt with through BethBC Sexual Harassment Policy.

### **Protection and support**

BethBC aims to encourage openness and will support staff and students who raise genuine concerns under this policy, even if they turn out to be mistaken.

If the whistleblower's allegation is true, then, nothing to be feared of/from. However, if the discloser is found to be incorrect, the whistleblower will not suffer any detriment actions including dismissal, disciplinary action, threats or other unfavorable treatment (such as bullying and harassment) connected with raising a concern. In case of suffering any such treatment, the WBO should informed immediately.

On the other hand, any disclosure made in bad faith or maliciously, will not be tolerated and could lead to disciplinary action.

The Identity of the Whistleblower will not normally be disclosed to the Person Subject of the Concern. If, however, during the investigation of the concern it becomes clear that disciplinary and /or criminal proceedings may need to be instituted, the Whistleblower should be made aware that it may be necessary to disclose their name to provide evidence for these proceedings. If this becomes necessary, the Whistleblower will be asked to consent to this before disclosure is made,

and assured of the full support of BethBC, and if need be, for arrangements to be made to minimize contact with the Person Subject of Concern etc. If the Whistleblower does not consent, it may still be possible to proceed with the investigation, though consideration should be given to the fact that information from an anonymous source may not carry the same weight of evidence.

In cases where the Police or Statutory Authority investigate, the Whistleblower should be informed that BethBC may be compelled to reveal the identity of the Whistleblower in compliance with Statutory Law.

If the whistleblower works for BethBC, he/she should know that any allegation made will not influence, or be influenced by, any unrelated disciplinary action against him/her or any redundancy procedures that may affect him/her.

### **Anonymous allegations**

We encourage revealing the name when making the allegation. However, in some cases an individual may choose to report anonymously. Concerns raised anonymously tend to be far less effective and may not be taken further if the whistleblower has not provided sufficient information needed to do so. For example, in the case of not having enough information, we may not be able to investigate the matter at all.

Although the whistleblower will not be involved in how the wrongdoing is dealt with, they may be kept informed of what progress is being made.

### **Untrue allegations**

When making an allegation which the whistleblower believes is true, but it is not confirmed by our investigation, we will not take any action against the person. However, if making an allegation which the whistleblower knows is untrue; appropriate disciplinary or legal action will be taken against the person.

### **How to raise a concern**

Concerns may be raised to direct supervisors/ first line managers who will report to the HR Manager. It is worth to mention that the whistleblower has the option of raising the disclosed concerns directly to the HR Manager; who will make sure that the whistleblower fills in the safeguarding recording form. Afterwards, the HR Manager raises the concern to the SLT, who, in alignment with the HR Manager will address the disclosed concern.

### **How we respond to disclosed concerns**

Investigations will not normally be undertaken by the WBO/ HR Manager. The WBO in alignment with the SLT will appoint an investigator or team of investigators which might include staff with relevant experience or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change so as minimize the risk of future wrongdoing. However, it is for the SLT and the WBO to decide what action we should take as a result of any whistleblowing investigation.

The WBO will aim to keep the whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving any specific details of the investigation or any action taken as a result.

It is difficult to set further timescales as they depend on the nature of the allegation and the type of investigation that needs to be carried out.

The amount of contact with the investigating officer will depend on the nature of the concern, the potential difficulties involved, and how clear the information is.

If the whistleblower needs to have a meeting, he/she can be accompanied by an internal or external party. Meetings with the person investigating the matter will normally take place in his or her office but can be arranged elsewhere, but not in the whistleblower's home unless there are exceptional circumstances.

Usually, the whistleblower will receive feedback on the progress and outcome of any investigation. Details of any concerns raised will be kept confidential (unless they are found to be malicious and lead to disciplinary procedures) but will not be placed on the whistleblower's personal file.

### **How to take the matter further?**

Hopefully the whistleblower will be satisfied with any action taken. If not, the matter may be addressed externally, by contacting:

The Ministry of Labour  
Telephone: 02-2982800  
Ramallah, Irsal Street  
Email: [info@mol.pna.ps](mailto:info@mol.pna.ps)

The Ministry of Higher Education  
Telephone: (+970) 2 298 2600  
Ramallah, Al Masyoon Street  
Email: [info@mohe.pna.ps](mailto:info@mohe.pna.ps)

Palestinian Anti- Corruption Commission  
Tel: 00970 2 2424016/7/8  
Ramallah, Al Bireh-Al Balo' Street  
Email: [info@pacc.pna.ps](mailto:info@pacc.pna.ps)

***If taking the matter to an external party, make sure not to reveal any confidential information.***