CAMARA EDUCATION WHISTLEBLOWING POLICY
Updated August 2026
Date of next renewal- August 2027

PURPOSE OF POLICY

Camara Education ("the organisation") is fully committed to implementing and promoting measures to ensure that employees and volunteers feel confident and safe to raise concerns and disclose information on any matters which appear to go against the policies, practices or laws surrounding the organisation. We want to ensure that staff are aware of the steps to take in raising concerns and what to expect when information, concerns or a disclosure are made. This policy lays out the types of concerns which can be raised and also the steps to take to report these within the organisation.

Scope

This policy applies across Camara Education and to all employees, volunteers, interns, consultants and contractors working for or on behalf of Camara Education. It provides guidance on how to raise concerns or make disclosures about incidents, issues or practices happening within, or related to, the organisation.

Please note that if you have a concern in relation to your own employment or personal circumstances in the workplace, this should be dealt with by way of our Grievance Policy. Likewise concerns or issues around workplace relationships should generally be dealt with through our Dignity at Work policy.

It is also important to note that this policy does not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist these must be complied with fully.

What is Whistleblowing?

Whistleblowing occurs when an employee/volunteer raises a concern or discloses information which relates to wrongdoing, illegal practices or unethical conduct which has come to his/her attention through work.

Our whistle-blowing policy is intended to encourage and enable employees and volunteers to raise concerns within our workplace rather than overlooking a problem or

only“blowing the whistle” externally. Under this policy, an employee or volunteer is entitled and encouraged to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination or disadvantage.

Our Commitment

This organisation is committed to maintaining an open culture with the highest standards of honesty and accountability where our employees and volunteers can report any concerns in confidence. All concerns or reports shared should be seriously investigated and responded to by leadership within the organisation.

What types of concerns can be raised?

A concern or disclosure should relate to a relevant wrongdoing such as possible fraud, crime, danger or failure to comply with any legal obligation which has come to your attention in connection with the organisation or your employment and about which you have a reasonable belief of wrongdoing.

Reportable misconduct may have happened, be happening, or be likely to happen. Misconduct is reportable irrespective of the seniority of staff implicated and we encourage staff to report their concerns.

Reportable acts include the following suspected activities and/or dangers at work (this list is not exhaustive):

- breach of Camara Education internal policies and procedures;
- failure to comply with any legal obligations or regulatory requirements;
- issues relating to child protection;
- incidences of fraud or theft;
- incidences of bribery or corruption;
- incidences of money laundering;
- incidences of contracting with, or funding, a terrorist organisation;
- irregularities with procurement;
- abuse of position at Camara Education to obtain personal benefits;
- a criminal offence or planned criminal offence;
- deliberate and serious endangerment of an individual’s health and safety;

- incidences of bullying, harassment, misconduct or discrimination which has not been appropriately dealt with or is being ignored by line management
- unauthorised disclosure of confidential information;
- environmental damage; and/or
- concealment of information on any of the above.

What types of concerns should not be raised under this Procedure?

A personal concern, for example a grievance around your own contract of employment would not be regarded as a whistleblowing concern and would be more appropriately processed through our Grievance Policy. In the first instance, issues of bullying or harassment should be dealt with through Camara's Dignity at Work Policy.

Safeguards and Penalisation

An employee/volunteer who makes a disclosure and has a reasonable belief of wrongdoing will not be penalised by this organisation, even if the concerns or disclosure turn out to be unfounded.

Employees/Volunteers are not expected to prove the truth of an allegation. However they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action may be taken against any worker who is found to have raised a concern or raised a disclosure with malicious intent.

Employees/Volunteers who penalise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action. Examples of penalisation include suspension/dismissal, disciplinary action, demotion, discrimination, threats or other unfavourable treatment arising from raising a concern or making a disclosure on the basis of reasonable belief for doing so. If any staff member or volunteer believes they are being subjected to penalisation as a result of making a disclosure under this procedure, they should inform their line manager/senior manager immediately.

Confidentiality

Camara Education is committed to protecting the identity of an employee/volunteer raising a concern and ensures that relevant disclosures are treated in confidence. The focus will be on the wrongdoing rather than the person making the disclosure.

However, there may be circumstances under applicable law or as part of an investigation where confidentiality cannot be maintained. Should such a situation arise, Camara Education will make every effort to inform the employee/volunteer that their identity may need to be disclosed.

Raising a Concern Anonymously

A concern may be raised anonymously. However, on a practical level it may be difficult to investigate such a concern. We would encourage employees and volunteers to put their names to allegations, with our assurance of confidentiality where possible, in order to facilitate appropriate follow-up. This will make it easier for us to assess the disclosure and take appropriate action including an investigation if necessary.

Procedure for Raising a Concern

Who should you raise your concern with?

As a first step, concerns should normally be raised with your line manager or relevant Country Director. However, if you do not wish to use this route, for example because of the seriousness or sensitivity of the concern, because the concern involves your manager or Country Director, or because you believe a previous report has not been appropriately addressed, the concern should be reported directly to the CEO.

The investigation will be undertaken by an appropriate person appointed by Camara Education, taking account of the nature and circumstances of the disclosure.

How to raise a concern

Concerns may be raised verbally or in writing. Should you raise a concern verbally we will keep a written record of our conversation and provide you with a copy after our meeting. Should you raise a concern in writing we would ask you to give the background and history of the concern, giving relevant details, insofar as is possible, such as dates, sequence of events and description of circumstances.

The earlier you express the concern the easier it will be for us to deal with the matter quickly.

Having raised your concern with us, we will arrange a meeting to discuss the matter with you on a strictly confidential basis. We will need to clarify at this point if the concern is appropriate to this procedure or is a matter more appropriate to our other procedures, for example our Grievance or Dignity at Work procedures.

You can choose whether or not you want to be accompanied by a colleague or other representative. With regard to confidentiality, it is important that there should be an awareness of respecting sensitive organisational information, which, while unrelated to the disclosure, may be disclosed in the course of a consultation or investigation process.

How we will deal with your disclosure

Having met with you in regard to your concern and clarified that the matter is in fact appropriate to this procedure, we will carry out an initial assessment to examine what actions we need to take to deal with the matter. This may involve simply clarifying certain matters, clearing up misunderstandings or resolving the matter by agreed action without the need for an investigation.

If, on the basis of the initial assessment, we conclude that there are grounds for concern that cannot be dealt with at this point, we will conduct an investigation which will be carried out fairly and objectively. The form and scope of the investigation will depend on the subject matter of the disclosure.

Disclosures may, in the light of the seriousness of the matters raised, be referred immediately to the appropriate authorities. Likewise, if urgent action is required (for example to remove a health and safety hazard), this action will be taken.

It is important to us that you feel assured that a disclosure made by you under this policy is taken seriously and that you are kept informed of steps being taken by us in response to your disclosure.

In this regard we undertake to communicate with you as follows:

● We will acknowledge receipt of your disclosure and arrange to meet with you as outlined above;

● We will inform you of how we propose to investigate the matter and keep you informed of actions, where possible, in that regard including the outcome of any investigation, and, should it be the case, why no further investigation will take place. However it is important

to note that sometimes the need for confidentiality and legal considerations may prevent us from giving you specific details of an investigation.

● We will inform you of the likely time scales in regard to each of the steps being taken but in any event we commit to dealing with the matter as quickly as practicable.

It is possible that in the course of an investigation you may be asked to clarify certain matters. To maximise confidentiality such a meeting can take place off site and you can choose whether or not to be accompanied by a colleague or other representative.

The investigation will be undertaken by an appropriate person appointed by Camara Education, taking account of the nature and circumstances of the disclosure.

The findings and recommendations of which will be shared with the CEO of Camara Education who will make the final decision as regards how to proceed.

Depending on the disclosure and circumstances, the Camara Education Board may be required to be involved in the investigation process or to assist in the decision making process.

Where a concern is raised or a disclosure is made in accordance with this policy, but the allegation is subsequently not upheld by an investigation, no action will be taken against the employee/volunteer making the disclosure and the employee/volunteer will be protected against any penalisation. It is important to note that if an unfounded allegation is found to have been with malicious intent, then disciplinary action may be taken in accordance with our Disciplinary Policy.

How the matter can be taken further

The aim of this Policy is to provide an avenue within this workplace to deal with concerns or disclosures in regard to wrongdoing. We are confident that issues can be dealt with "in house" and we strongly encourage all employees and volunteers to report such concerns internally.

It is important to note however, that while you need only have a reasonable belief as to wrong doing to make a disclosure internally, if you are considering an external disclosure, different and potentially more onerous obligations apply depending on to whom the disclosure is made.

Workers who raise concerns or make protected disclosures may have legal protections under the laws of the country in which they work. Camara Education will comply with all applicable whistleblowing and protected disclosure legislation in each jurisdiction in

which it operates. Camara Education will not tolerate retaliation, penalisation or detrimental treatment of anyone who raises a concern in good faith.

Reporting Contacts

● Relevant Country Director – concerns should normally be raised with the Country Director for your country/hub.

● CEO – Ibolya Nemeth – ibolyanemeth@camara.org

Where a concern involves the Country Director, or an individual does not feel comfortable raising the matter through normal management channels, it should be reported directly to the CEO.

Reviewed and revised August 2026

Ibolya Nemeth, CEO, Camara Education