



**INTERNAL INFORMATION CHANNEL POLICY
OF
BRITISH SCHOOL OF TENERIFE**



1. INTRODUCTION

This Policy is developed in accordance with the following applicable legislation:

- Law 2/2023, of 20 February, on the protection of persons who report regulatory breaches and on the fight against corruption.
- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.
- Law 1/2019, of 20 February, on Trade Secrets.
- Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation – GDPR).
- Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD).
- Organic Law 10/1995, of 23 November, of the Criminal Code.
- Treaty on the Functioning of the European Union (TFEU).
- ISO Standard 37002:2021 on whistleblowing management systems.

This Policy applies to BRITISH SCHOOL OF TENERIFE and sets out the general principles regarding the Internal Information System and the protection of whistleblowers. It is duly communicated and made available within BRITISH SCHOOL OF TENERIFE.

At BRITISH SCHOOL OF TENERIFE, we are strongly committed to a culture of ethics and legal compliance. To strengthen communication in all its forms, we provide employees and collaborators with an Information Channel.

The purpose of this Policy is to define the criteria and principles governing communication, as well as the management of all information received through the Information Channel. Communications received will be handled and resolved in accordance with this Policy, always respecting confidentiality and ensuring that no retaliation is taken against the whistleblower.

The Information Channel is designed as a means of communication — a secure and, where appropriate, anonymous platform or route for receiving information regarding non-compliance or irregularities related to applicable rules and policies at BRITISH SCHOOL OF TENERIFE.

The Information Channel should be the preferred method for submitting information, in order to ensure diligent and effective action within BRITISH SCHOOL OF TENERIFE, potentially preventing harmful consequences resulting from the conduct being investigated. However, although this preference is stated, whistleblowers may choose the internal or external channel depending on their circumstances and perceived risk of retaliation.

The Information Channel allows communications to be submitted in writing, verbally, or both. Information can be submitted in writing through postal mail or through any enabled electronic means, or verbally, either by telephone or through a voice messaging system. At the request of



the whistleblower, it may also be submitted via a face-to-face meeting, to be held within a maximum period of seven days.

The Information Channel has been designed in compliance with certain key requirements, including its accessibility, confidentiality guarantees, proper procedures for follow-up, investigation and protection of the whistleblower, as well as the inclusion of clear and accessible information on external reporting channels to the competent authorities and, where applicable, to the institutions, bodies or agencies of the European Union.

The Information Channel permits anonymous communication. When a report is submitted through the Information Channel and falls within the scope of the Law, the specific rule concerning the possibility of submitting and processing anonymous communications shall apply. Maintaining the anonymity of the whistleblower is established as a fundamental principle.

→ Material and Subjective Scope

The purpose of the Law is to provide adequate protection against retaliation for individuals who report certain acts or omissions through the procedures provided therein, as well as to strengthen the culture of reporting, the integrity infrastructures of organisations, and to promote a reporting culture as a mechanism to prevent and detect threats to the public interest. In any case, it encompasses serious or very serious criminal or administrative offences that result in financial harm to the Public Treasury or Social Security.

It also provides protection for individuals who, in a workplace or professional context, detect and report serious or very serious criminal or administrative infringements through the Information Channel. This includes offences under national law, allowing both internal and external reporting channels to focus their investigative activity on breaches that are considered to have a greater impact on society as a whole.

Moreover, situations governed by specific sectoral regulations or EU instruments providing their own mechanisms for reporting infringements and protecting whistleblowers are excluded from the material scope of this Law.

In addition to defining the material scope, the Law also establishes a subjective scope, identifying the individuals who are protected against potential retaliation. This protection extends to any individuals with a professional or employment relationship with BRITISH SCHOOL OF TENERIFE, including those whose relationship has ended interns or trainees, and individuals participating in selection processes. Protection is also extended to those who support whistleblowers, as well as to others close to them who may be subject to retaliation, among others.

This applies to whistleblowers who obtain information about breaches in a work-related or professional context, including in any case:

- a) Persons who are public employees or employees under an employment contract.
- b) Self-employed individuals.
- c) Members of the governing body / board of directors, management or supervisory bodies of BRITISH SCHOOL OF TENERIFE, including non-executive members.



d) Any person working for or under the supervision and direction of contractors, subcontractors, or suppliers.

The same protection shall apply to whistleblowers who report or publicly disclose information about breaches obtained in the context of a relationship that has already ended, as well as volunteers, interns, trainees, regardless of whether they are remunerated or not, and individuals whose employment relationship has not yet commenced, where the information was obtained during a selection or pre-contractual negotiation process.

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2. ELIGIBLE PERSONS TO SUBMIT A REPORT

This Policy outlines the principles that underpin the Information Channel of BRITISH SCHOOL OF TENERIFE, as the preferred mechanism for reporting acts or omissions, which must in all cases be addressed effectively by BRITISH SCHOOL OF TENERIFE, and constitutes a standard for whistleblower protection.

Reports or enquiries may be submitted by all employees, students, legal representatives, suppliers, volunteers, and collaborators of BRITISH SCHOOL OF TENERIFE who become aware of any facts that could constitute a criminal offence, breach of internal rules, policies or protocols, or potential breaches that have not yet occurred but could reasonably take place.

Communications may be submitted by:

- All personnel employed under a contract of employment or self-employed, or otherwise affiliated with BRITISH SCHOOL OF TENERIFE.
- Other associated individuals, including volunteers and unpaid interns.
- Associations and members of the Governing Body / Board of Directors, including non-executive members.
- Business partners, suppliers, internal collaborators, students, legal representatives, and other related stakeholders.

This Policy is available to all interested parties to provide information regarding the rights of individuals using the Information Channel and of those involved in the reported facts, as well as regarding the confidential treatment of personal data carried out by BRITISH SCHOOL OF TENERIFE. Any member of BRITISH SCHOOL OF TENERIFE who becomes aware of the commission of a criminal offence, irregularity, breach, or risk of such a breach of legal or internal regulations may report it through the Information Channel.

→ Scope of the Policy

This Policy is binding and applicable to BRITISH SCHOOL OF TENERIFE, and therefore to all employees and members of the organisation, regardless of their role or geographical location.



The various protection measures outlined in this Policy shall apply, as appropriate, to Whistleblowers, Related Third Parties, and Persons Affected by the Report.

BRITISH SCHOOL OF TENERIFE provides information on the different internal reporting and communication mechanisms it has established, indicating that communications may be submitted either anonymously or with identification, through the Internal Information System (Information Channel), which ensures the principles and safeguards for Whistleblowers, Related Third Parties, and Affected Persons.

Furthermore, upon request by the whistleblower, a report may also be submitted through a face-to-face meeting within a maximum period of seven days.

Reports may relate to events that occurred within a professional or work-related context. Such events may concern relationships that are:

- Ongoing,
- Already terminated, or
- Not yet commenced, such as breaches occurring during selection or pre-contractual negotiation processes.

In all cases, BRITISH SCHOOL OF TENERIFE will ensure that the Information Channel remains a secure reporting mechanism, compliant with data protection legislation and safeguarding the rights of Whistleblowers, Related Third Parties, and Affected Persons affected by the report, as well as their confidentiality, and shall ensure that no retaliation is taken against them when the Information Channel is used in good faith.

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3. REPORTABLE BREACHES

The unlawful or potentially unlawful conduct that may be reported through the Information Channel includes, but is not limited to, the following areas:

- Public procurement
- Financial sector
- Prevention of money laundering and terrorist financing: Any action potentially related to money laundering or non-compliance with applicable regulations in this area.
- Environmental protection
- Consumer protection
- Privacy and personal data protection, and security of information systems and networks
- Financial interests of the Union and internal market
- Harassment: Any persistent action that causes discomfort or harm to a person. This includes all forms of harassment.



- Fraud and corruption: Any conduct involving corruption, bribery, fraud, or the giving or receiving of gifts or benefits that may affect objectivity or influence a business, professional or administrative relationship.
- Conduct contrary to the Code of Conduct: Any behaviour that goes against the commitments set out in the Code of Conduct, including actions contrary to honesty, responsibility, transparency, and integrity, and influenced by personal interests or external pressure.
- Health and Safety risks: Any negligent behaviour by a colleague, supervisor or by BRITISH SCHOOL OF TENERIFE itself that could endanger any person, whether a staff member or an unrelated third party.
- Malpractice: Any inappropriate conduct such as offering gifts in exchange for business, or violating legal or internal regulations.
- Respect and equal opportunities: Any act of discrimination based on gender, race, sexual orientation, religious beliefs, political views, nationality, social background, disability or any other personal, physical or social condition.
- Workplace conflict
- Working conditions
- Acts contrary to the integrity of BRITISH SCHOOL OF TENERIFE
- Asset fraud
- Favouritism
- Financial reporting
- Legal or regulatory non-compliance
- In Spain, the scope of protection also covers serious or very serious criminal or administrative offences.
- Any other incident that may potentially endanger the reputation, assets or individuals associated with BRITISH SCHOOL OF TENERIFE.

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4. GUARANTEES FOR WHISTLEBLOWERS ACTING IN GOOD FAITH

→ Principles and protection parameters – Individuals entitled to protection

A. Communications made in good faith

Users of the Information Channel are responsible for the truthfulness of both their identity and the information submitted, and must act in good faith.



Good faith—the honest belief that serious harm has occurred or could occur—is a fundamental requirement for whistleblower protection. Good faith reflects civic responsibility and contrasts with other behaviours that must be excluded from protection, such as submitting false or misleading information or information obtained illegally.

A whistleblower is considered to be acting in good faith if, at the time of the report, they have reasonable grounds or indications to believe that the risks or breaches they report are credible and should be investigated, even if they do not provide conclusive evidence. Reports that have already been rejected through other corporate communication channels, where the same information has been expressly dismissed, assessed or resolved, shall be excluded from the Information Channel—unless new facts or supporting evidence are provided. Likewise, communications containing information that does not fall within the defined scope will also be dismissed.

Communications made in good faith include:

- Reports based on facts or indications that reasonably suggest irregular conduct, or conduct contrary to the Code of Conduct or any other internal or external regulation of BRITISH SCHOOL OF TENERIFE.
- Reports where, even if documents or materials supporting the reported facts are not available at the time of submission, the content is submitted in accordance with this Policy and without wilful disregard for the truth, without any intent of revenge, harm to a professional or working relationship, or to damage the honour of an employee, student, legal representative or third party, among others.
- Where a whistleblower makes a public disclosure, they shall also benefit from special protective conditions, including the following:
- That they have first reported through internal and external channels, or directly through external channels.
- That they have reasonable grounds to believe that either the breach poses an imminent or clear threat to the public interest, or that, in the case of reporting via an external channel, there is a risk of retaliation or little likelihood of effective follow-up due to particular circumstances (e.g. destruction of evidence, collusion between the authority and the offender, or involvement of the authority in the offence).
- The conditions for protection shall not apply when a person discloses information directly to the press in the legitimate exercise of freedom of expression and access to truthful information, as recognised by constitutional and legal frameworks.
- B. Communications Made in Bad Faith
- BRITISH SCHOOL OF TENERIFE reserves the right to disclose the identity of the whistleblower to the authorities if the communication is made in bad faith, or in response to a judicial request.
- Knowingly submitting false communications constitutes a very serious offence under the Disciplinary System. Effective, proportionate, and dissuasive sanctions will be applied to



individuals who submit malicious or abusive communications or disclosures. This includes measures aimed at compensating persons who have suffered harm or damages resulting from such misconduct. These sanctions may apply to those who, among other actions:

- Prevent or attempt to prevent communications.
- Take retaliatory measures against whistleblowers.
- Promote unfounded legal proceedings against whistleblowers.
- Breach the duty of confidentiality regarding the identity of whistleblowers.

- Whistleblowers acting in bad faith will be subject to disciplinary action, without prejudice to any criminal or civil liabilities that may arise from their conduct.
 - BRITISH SCHOOL OF TENERIFE will provide protection to both whistleblowers acting in good faith and related third parties against any harm they may suffer as a result of their reporting. Protection will also be extended, in accordance with the legal provisions, to individuals affected by the report.
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5. PROTECTIVE MEASURES

Whistleblowers shall benefit from protection as long as they have reasonable grounds to believe that the information reported is accurate at the time of submission. It is therefore essential that the information provided is truthful, clear, and concise, and supported, wherever possible, by evidence.

Anyone submitting a report via the Information Channel in good faith will be protected under this Policy.

Regarding whistleblowers and related third parties, BRITISH SCHOOL OF TENERIFE guarantees the confidentiality of their identity and personal data, and the prohibition of any retaliation, including threats or attempted retaliation. Retaliation is understood to include any act or omission prohibited by law that places the affected person at a disadvantage in a professional or employment context. Examples include:

Employment-related consequences such as disciplinary measures or damage to career progression.

- Economic or reputational harm, coercion, harassment, or exclusion.
Negative performance evaluations or references.
 - Blacklisting or dissemination of adverse information that hinders employment.
 - Revocation or denial of licences or permits.
 - Denial of training opportunities.
 - Discriminatory, unfair, or unfavourable treatment.
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5.1 Protective Measures for Whistleblowers and Related Third Parties



- Confidentiality and data protection: BRITISH SCHOOL OF TENERIFE is obliged to preserve the identity of whistleblowers and related third parties and to ensure confidential processing of their personal data. The Information Channel is designed, implemented and managed securely to protect identities and all associated data from unauthorised access. The organisation is committed to not processing personal data that is not necessary for the assessment of the reported misconduct and, in the absence of legal justification, such data will be deleted immediately.
- Should external consultants, advisors or professionals be involved, they must also guarantee the confidentiality of the information and personal data they access. All members of BRITISH SCHOOL OF TENERIFE, as well as any external parties with access to this information, must maintain strict confidentiality.
- The identity of the whistleblower shall not be disclosed under the right of access to personal data, and such identity shall only be shared with judicial authorities, the Public Prosecutor, or the competent administrative authority, always under secure and restricted conditions.
- Anonymous reporting: The Information Channel allows individuals to submit communications anonymously, should they prefer not to provide personal details. Such reports must be credible and must present reasonable indications of the alleged breach. If the report appears to have malicious or dishonest motives, it will be excluded.
- Absence and prohibition of retaliation: No authorised person using the Information Channel in good faith shall be dismissed, disciplined, or otherwise negatively affected in their employment or professional relationship. Good faith reports will not be considered a breach of confidentiality. Retaliation, threats, or attempts thereof are strictly prohibited by any member of BRITISH SCHOOL OF TENERIFE.
- Even though whistleblowers are protected, this does not exempt them from liability if they have participated in the reported misconduct. However, this may be considered a mitigating circumstance in disciplinary procedures. Any retaliation against whistleblowers may lead to disciplinary action.
- Right of access to information: Any person who submits a communication through the Information Channel has the right to be informed about progress and the outcome of the investigation, if such an investigation is conducted. Even if not directly affected, identified whistleblowers may request updates. Decisions on the level of disclosure will be taken on a case-by-case basis. All whistleblowers, whether anonymous or identified, are encouraged to access the communication portal regularly to view updates and interact with Channel managers if necessary.
- Right to withdraw the report: Any individual may choose to withdraw their report at any time if they decide not to continue with the communication process. However, if the reported facts indicate a potential breach or irregularity, an internal investigation may still be initiated ex officio.

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- 5.2 Protective Measures for Persons Affected by the Report
- The main protective measures and rights for persons affected by the report during the investigative process include:
- Right to the presumption of innocence: Affected persons are entitled to be presumed innocent and to have their honour respected.
- Right to be informed: Affected persons have the right to be informed of the actions or omissions attributed to them and to be heard at any time. The timing and method of communication will be determined in a way that ensures the proper development of the investigation.
- Right to defence
- Right to access the case file
- Protection of identity, ensuring the confidentiality of the facts and procedural data
- Compliance with deadlines established by applicable legislation and the Information Channel Management Procedure

→ Activation of Protection

Protection measures for the whistleblower, related third parties and persons affected by the report shall be activated as soon as the communication is received, and shall remain in place throughout the investigation and, where necessary, after the conclusion of the process.

→ External Reporting Channels

Any individual may report directly to the Independent Whistleblower Protection Authority (A.A.I.), or to the corresponding regional or national authorities, regarding any action or omission falling within the scope of the Law.

a) National Channels

- National Anti-Fraud Coordination Service
<https://www.igae.pap.hacienda.gob.es/sitios/igae/es-ES/snca/paginas/comunicacionsnca.aspx>
- Anti-Corruption and Organised Crime Prosecution Office
<https://www.fiscal.es/>
- National Police
https://www.policia.es/_es/denuncias.php
- Court of Auditors
<https://www.tcu.es/es>
- Ombudsman
<https://www.defensordelpueblo.es/>
- Government of the Canary Islands
<https://www.gobiernodecanarias.org/>



b) European Channels

- European Court of Auditors
<https://www.eca.europa.eu/es>
 - European Anti-Fraud Office (OLAF)
https://anti-fraud.ec.europa.eu/olaf-and-you/report-fraud_es
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6. PRINCIPLES OF THE INFORMATION CHANNEL

At BRITISH SCHOOL OF TENERIFE, we are guided by the following general principles:

- **Accessibility:** The channel is easily accessible to employees, students, legal representatives, volunteers, members of the Governing Body / Board of Directors, suppliers, and other interested parties.
- **Confidentiality:** Absolute confidentiality in handling reports and enquiries, particularly regarding personal data. Disclosure shall only occur under the "need-to-know principle".
- **Staff training:** In cases where communications are submitted through channels other than the designated Information Channel, personnel not responsible for handling them are trained in this matter and required to immediately forward the report to the System Manager, as failure to do so may be considered a serious disciplinary offence.
- **Proportionality:** All actions must comply with the applicable legislation, be carried out objectively and appropriately, and observe the principle of proportionality.
- **Regulatory compliance:** Strict adherence to applicable laws and internal policies on privacy and personal data protection. All staff, suppliers, volunteers, and collaborators must comply with the law and avoid behaviour that could damage the reputation of BRITISH SCHOOL OF TENERIFE.
- **Due diligence:** Reports must be handled diligently, and a decision must be taken within a maximum of two months.
- **Promptness:** Evidence must be gathered as quickly as possible, especially in cases of serious misconduct or where the reputation of any party could be affected.
- **No retaliation for whistleblowers acting in good faith:** Whistleblowers are protected from retaliation. However, legal action may be taken against those who submit false reports.
- **Fair and respectful treatment:** Affected persons will be treated with dignity and presumed innocent until proven otherwise, with their right to be heard respected throughout the process.
- **Simple and efficient process:** The Information Channel ensures a simple and effective mechanism, including a four-stage acknowledgement process and the ability to maintain ongoing communication with the whistleblower if needed.
- **Bad faith reports:** Whistleblowers who submit false or malicious reports may face disciplinary or legal consequences.



- Respect for individuals: Cultural diversity and dignity are respected at all times. BRITISH SCHOOL OF TENERIFE fosters a respectful, inclusive, harassment-free workplace.
- Effective equality: Commitment to gender equality and individual freedom, aligned with occupational health and safety.
- Protection of professionals: Continuous updates to occupational risk prevention measures ensure high standards of safety and wellbeing.
- Compliance with Competition and Intellectual Property Laws
- Respect for fair competition
- Due diligence in promotional practices
- Anti-corruption and conflict of interest prevention
- Due diligence in administrative, financial, and economic management
- Personal data protection and confidentiality
- Protection of corporate resources and cybersecurity
- Prevention of money laundering
- Worker safety and protection
- Environmental commitment

7. RECORD OF COMMUNICATIONS

All communications will be logged in the Information Channel, ensuring that unauthorised third parties cannot access them. For statistical and preventive purposes, communication content may be retained without personal references once the investigation is concluded, to serve as evidence of the system's operation.

In particular:

- Data will only be retained for as long as necessary to assess whether an investigation should be opened. If any information is found to be false, it will be deleted immediately— unless it constitutes a criminal offence, in which case it may be retained for judicial purposes.
- If no investigation begins within three months, the report will be deleted, unless retained solely as evidence of system functioning.
- Unprocessed communications will be anonymised.
- In no case will data be stored for more than 10 years.

8. CONFLICT OF INTEREST MANAGEMENT



A conflict of interest arises when an individual involved in the investigation has a personal or professional interest in the outcome of the case. All tasks carried out by appointed investigators must be conducted objectively, independently, and impartially, as even the appearance of a conflict can damage the reputation of BRITISH SCHOOL OF TENERIFE, its members, or the parties involved.

In such cases, the following principles shall apply:

- Disclosure: The individual must inform their immediate superior, who will assess whether they should be replaced or allowed to continue.
- Recusal: If the person is part of a collective decision-making group, they must inform their peers and abstain from participating in discussions, voting, or accessing confidential information related to the matter.
- Independence: All involved must act with integrity and loyalty to BRITISH SCHOOL OF TENERIFE, avoiding conflicts between personal and organisational interests.

The causes of incompatibility include, among others:

- Direct relationship between the whistleblower and the person reported/investigated.
- Direct connection with the misconduct being reported.
- Clear friendship or enmity with either the whistleblower or the person reported/investigated, or with at least one of them.
- Marriage or similar relationship, emotional bond, or family relationship with the whistleblower or the person reported/investigated, or with at least one of them.

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9. OPERATION OF THE CHANNEL

The Information Channel Management Procedure consists of four phases: Reception, Evaluation, Investigation (Instruction and Measures), and Response / Conclusion.

I. Reception Phase – Receiving Communications

Communications may be submitted through the following link:
<https://britishschooltenerife.complylaw-canaletico.es/public/11fffb8ab711ebb5599291b59a38128f/formulario>

Strict confidentiality will be maintained regarding the whistleblower's identity and any personal data provided. This phase includes:

- Reception methods, including anonymous and named communications.
- Protection measures for all involved parties: whistleblowers, related third parties, and affected persons.
- Immediate management of potential conflicts of interest.



- Communications received by other means must be forwarded to the System Manager.

Verbal communications will be documented by:

- Secure, durable and accessible recordings.
- Full and accurate transcripts made by responsible personnel, to be reviewed and signed by the whistleblower if necessary.

Ex officio procedures may also be initiated if the System Manager has indications of a potential breach.

Acknowledgement of receipt will be issued within 7 days, confirming confidentiality and informing the whistleblower that their identity will not be disclosed to affected parties or third parties.

Communication follow-up:

- The whistleblower will be informed, as far as legally possible, of follow-up actions taken.
- Justifications for follow-up decisions (investigation, referral, closure, etc.) will be communicated.
- Updates and outcomes will be shared, ensuring an open communication line throughout the process.



II. Evaluation Phase

After submission or ex officio initiation, the System Manager will assess the communication, decide whether to admit or archive it, and appoint an Investigator. The Investigator may be an external expert depending on the complexity.

III. Investigation Phase (Instruction and Measures)

Investigations will be carried out with professionalism, impartiality, and confidentiality. This includes:

- Allocation of adequate resources.
- Clear scope and terms of reference.
- Confidential and conflict-free procedures.
- Access to documents, interviews, reports, and digital records.
- Right of both whistleblower and affected person to propose evidence.
- Communication with whistleblower during the process.
- Reporting to authorities in serious cases.

The System Manager may also supervise IT tools proportionately and notify authorities if criminal acts are detected. All involved staff must respond truthfully and fully, under risk of disciplinary action for false or incomplete information.

Investigation duration: approximately 30 days.

III.1 Case File Instruction

Once admitted, the whistleblower and relevant third parties will be informed, and the case file opened. The instruction must ensure impartiality and expertise, aiming to produce a final investigation report and conclusions.

The affected person will be informed of the data processing and the alleged facts within one month, unless extended for justified reasons. A verbal or written summary of the facts will also be provided, ensuring the right to respond and submit evidence.

Internal, external, or mixed instruction may apply. The Investigator will verify the truth of the information and interview all involved parties. All sessions will be documented and signed.

Precautionary measures may be applied where there is:

- Immediate threat or danger
- Risk to physical or psychological integrity
- Risk of damage by the person investigated
- Reputational risk
- Risk of data loss or obstruction of investigation



- Suspicion of false report

These measures must be proportionate, respect personal rights and confidentiality, and not exceed necessary impact.

III.2 Personal Data Protection

All processing must comply with applicable personal data protection laws.

IV. Response / Conclusion Phase

This includes:

- Final investigation report and conclusions
- Adoption of corrective measures and appropriate sanctions
- Referral to authorities when needed
- Immediate notification to the Public Prosecutor or European Prosecutor if relevant
- Logging of decisions in the case register
- Closure/blocking of the case file

The maximum response time is 3 months, extendable by another 3 months in complex cases. Non-admitted communications will only be anonymised.

A final summary report and action plan will be drawn. Within 15 working days, the responsible team will meet to review and propose sanctions to the Management.

In serious cases, the decision-making team may report directly to the police or judicial authorities, after informing the Management.

Response phase duration: approximately 10 working days. Final measures will be documented, and the case file archived, if applicable.

10. PUBLICITY

This Policy shall be properly publicised within BRITISH SCHOOL OF TENERIFE.

It has been approved by the Governing Body / Board of Directors and any amendments must also be approved. This Policy will be reviewed and updated as necessary to reflect legal or jurisprudential developments.

11. EDITIONS AND REVIEW

The table below records the editions of this document. The COMMENTS-MODIFICATIONS column identifies the sections modified from the previous edition.



EDITION DATE COMMENTS – MODIFICATIONS

1st 12/06/2023 Initial document

2nd 12/06/2024 Document update