

WHISTLEBLOWING AT ISH

What does it mean?

ISH encourages staff and any other party to report to ISH findings of any misconduct. The Whistleblowing channel is designed to allow easy opportunity to inform and enable ISH to intervene in harmful occurrences that are happening or about to happen and to protect members of the ISH community. The reports should be made sincerely and with integrity.

“Whistleblowing” means disclosing of information which contains data on breach of the laws, violation of human rights, execution of public authorizations contrary to the purpose it has been entrusted for, jeopardy for life, public health, security, environment, as well as for the purpose of preventing of damage of large proportions. The Information may contain data of the whistleblower. The Employer and authorities in charge are obliged to act upon anonymous notices in regard to the information, within their authorization.

“Information on breaches means information, including reasonable suspicions, about actual or potential breaches, which occurred or are very likely to occur in the organisation in which the reporting person works or has worked or in another organisation with which the reporting person is or was in contact through his or her work, and about attempts to conceal such breaches.” (EU Directive 2019/1937)

Whistleblowing Process

1. The announcements go to the Data Protection Officer (DPO) [dpo\(at\)ishelsinki.fi](mailto:dpo(at)ishelsinki.fi)
2. The DPO must make an initial assessment of the announcement and either accept or reject it. The DPO may reject the report in cases where it is obvious that the report contains false information or is done with malicious intent.
3. All accepted reports are discussed in the next Strategic Team meeting taking into account the following principles:
 - a. Members of the team are bound to anonymity by law.
 - b. When possible, the case will be handled anonymously even within the team.
 - c. A person whom the suspicion concerns or who has an interest in the matter will not participate in investigating a report.
4. Strategic Team meeting will decide next steps in handling the case.
5. If the whistleblower has given their own contact information, s/he will be informed that the announcement is being handled by school strategic leadership. If the next steps in handling the announcement are known within 7 days, the whistleblower can also be informed about those on a general level.
6. Latest, within 3 months from the announcement, the whistleblower will be informed about action taken by ISH to address the concern (if they have provided their own contact information).
7. The announcement and action taken will be carefully documented into ISH GDPR-files.

Protection of the whistleblower

The whistleblower is lawfully protected against any retaliation. Retaliation means any direct or indirect act or omission which occurs in a work-related context, which is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person.

Reporting persons shall qualify for protection provided that they had reasonable grounds to believe that the information on breaches reported was true at the time of reporting, and that such information fell within the scope of the Directive. (EU Directive 2019/1937, Article 6)

Whistleblowing announcement channel

The Whistleblowing channel below is open and accessible to anyone. If chosen, the informant can send the form fully anonymously. The form is coded in such a way that the informant cannot be identified. If the informant wishes to receive feedback on the announcement they must leave contact information.