



**INTERNAL INFORMATION CHANNEL
MANAGEMENT PROCEDURE
OF
BRITISH SCHOOL OF TENERIFE**

1. INTRODUCTION

In compliance with the provisions of Article 25 of Law 2/2023, of 20 February, regulating the protection of individuals who report regulatory infringements and the fight against corruption, we hereby inform you that, in accordance with the core principles of this Internal Information System or Information Channel, all information received will be analysed independently and confidentially. The utmost confidentiality—and, where applicable, anonymity—will be ensured throughout the investigation processes of the information received, in order to protect the identity and reputation of both the whistleblower and any individuals involved. Only those strictly necessary for the process will be informed. Where appropriate, competent authorities will be notified of any facts that may constitute a criminal, administrative, or labour offence.

Protection against any form of retaliation towards the whistleblower is also guaranteed. Should it be confirmed that such retaliation has occurred, those responsible will be subject to investigation and, where applicable, disciplinary measures.

Any deliberately false, malicious, or abusive report may lead to appropriate actions being taken against the whistleblower.

We also inform you that the internal information management system (information channel) of **BRITISH SCHOOL OF TENERIFE** is operated using the **COMPLYLAW Ethical Channel** solution, which complies with the privacy and data protection requirements set out in the aforementioned legislation. This management tool also meets the legal requirements to acknowledge receipt of the report within 7 days and to provide a response to the investigative actions within a maximum period of 3 months, except in particularly complex cases where this period may be extended for an additional maximum of 3 months.

Any communication submitted through the Information Channel must include the minimum necessary information to allow for an adequate analysis of the facts and, where appropriate, a corresponding investigation.

Therefore, at a minimum, the following information must be provided:

- Personal details of the whistleblower, unless submitted anonymously, such as full name, email address, and telephone number.
- A detailed description of the irregularity/non-compliance.
- Identification of any individuals possibly involved in the reported irregularity/non-compliance, and whether the whistleblower is among those involved in the described events.
- Any evidence that may be relevant to clarifying the alleged facts constituting an irregularity or breach by the organisation, including documents, files, or other means of proof to which the whistleblower has access.

All of the above is without prejudice to the fact that communications may also be submitted anonymously, in which case the personal information of the whistleblower, required under the standard communication process, will not be necessary.

The whistleblower undertakes to access the communication submitted via the Information Channel in order to respond, if necessary, to any requests from the Channel managers for

clarification of the facts — for example, if the information provided is deemed insufficient. It is the responsibility of the whistleblower to periodically access and review the communication on the Channel, regardless of whether it was submitted anonymously or under their name, in order to interact with the Channel managers. If, within 30 days from the last response/request made by the Channel managers, the whistleblower has not accessed the Channel or made direct contact, the communication will be archived, unless there is sufficient evidence to proceed with an ex officio investigation.

The Internal Information System or Information Channel will be managed in accordance with a proper procedure for handling communications, which is detailed in this Procedure. The Information Channel managers will be responsible for receiving all communications submitted by whistleblowers, whether anonymously or with the inclusion of personal details.

The Information Channel managers shall act with full independence and without any conflict of interest. Should a conflict arise, they will refrain from involvement in the specific case, although they may still participate in the analysis and investigation of other communications.

To ensure and safeguard the rights of whistleblowers, a straightforward and efficient procedure has been established to facilitate the handling and subsequent analysis of the information.

Additionally, communications are categorised according to their type, which the Information Channel will manage as follows:

- **Enquiry**
- **Report (Whistleblowing)**

All information will be directed to, received, and managed solely and exclusively by the Information Channel managers, who will ensure the secure processing, storage, and safeguarding of the information with strict confidentiality at all stages of the procedure.

Communications of any nature may be received through one of the following procedures:

- **Information Channel available on the organisation's website:**
<https://www.britishschooltenerife.com/>
- **Verbal or face-to-face communication with the organisation.**

The Information Channel managers will carry out the appropriate evaluation, analysis, and investigation of the information provided, in whichever format it was submitted. They will communicate the outcome they deem appropriate to the individuals involved in the incidents considered as irregularities or non-compliance, depending on the particular circumstances of the case.

2. STEPS TO SUBMIT A COMMUNICATION

For proper management, communications received must contain the necessary data to enable the analysis of the reported facts and should:

- Include an explanation of the events.
- Identify the person(s) involved in or aware of the reported behaviour.

- Indicate when the incident occurred or has been occurring.
- Provide, if deemed necessary, any documents, files or other information considered relevant for the assessment and resolution of the report.
- Include a contact method in case additional information is required.

The more detailed the information provided regarding the specific situation, the more effectively the report can be handled.

Knowingly false communications: If information is knowingly communicated or publicly disclosed with false content, the sanctions established under the disciplinary regime will apply.

Named or Anonymous Communication

It is possible to choose whether to submit a communication confidentially or anonymously.

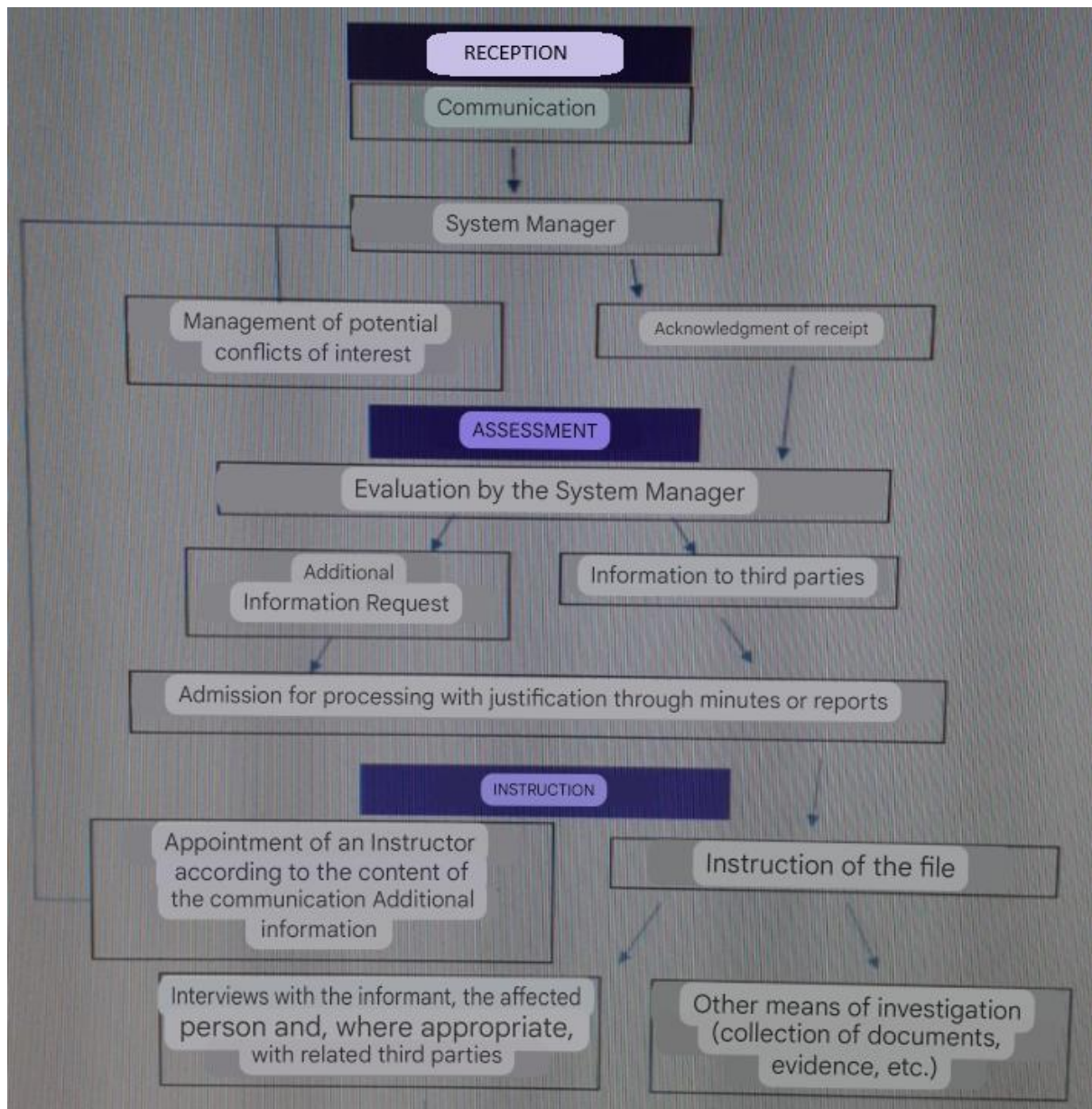
A. Named Communication: If the whistleblower decides to provide their contact details, they may be contacted for further information, if necessary.

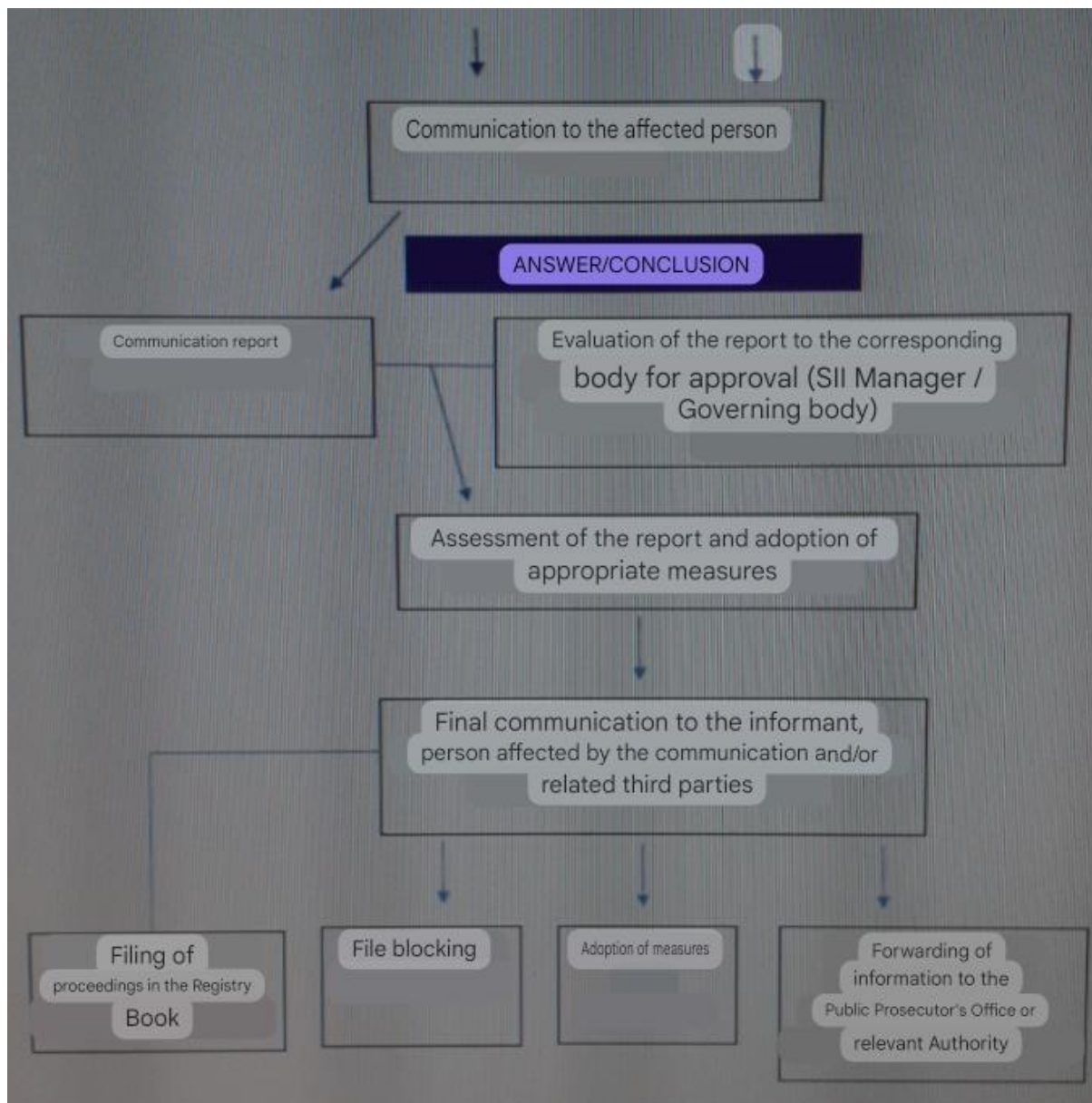
B. Anonymous Communication: If the whistleblower decides to submit the communication anonymously, they must keep the identification code generated when the enquiry/report is submitted. This code will allow them to follow up on the enquiry/report and check whether any additional information has been requested.

It is important to note that if additional information is requested, it is necessary to provide it in order for the communication to be properly managed and not closed due to insufficient information.

If you choose to submit an anonymous communication, please bear in mind that managing this type of communication is more complex, and may even prove unfeasible if the required clarifications are not provided during the analysis of the report.

2.1. Action Flowchart





Report on the communication → Assessment of the report by the appropriate body for approval (SII Manager / Governing Body)

2.2. Accessing the Homepage

This is the homepage accessed via the following URL:
<https://britishschooltenerife.complylaw-canaletico.es/public/11fffb8ab711ebb5599291b59a38128f/formulario>

To start the communication process, the first step is to select the type of communication you wish to submit:

2.3. Submitting an Enquiry

You may choose to identify yourself or remain anonymous by selecting the appropriate option from the dropdown menu.

*** Select communications category**

Select an option ...

Select an option ...

Enquiry

Information (breach)

If you choose to provide your personal details, you will need to complete the fields for Full Name, Telephone Number, and Email Address.

** Indicates Required Field.*

*** Select communications category**

Enquiry

*** Do you wish to identify yourself?**

Yes

Entity		
<input type="text"/>		
* Name	* Surname	Second surname
<input type="text"/>	<input type="text"/>	<input type="text"/>
IFN/IND	* Email	* Phone
<input type="text"/>	<input type="text"/>	<input type="text"/>

*** Consultation**

Entity: You must indicate the entity related to the subject of the enquiry, in this case, **BRITISH SCHOOL OF TENERIFE**.

If you choose to remain anonymous, the form fields requesting personal data will not appear.

* Indicates Required Field.

* Select communications category

Enquiry ▼

* Do you wish to identify yourself?

No ▼

* Consultation

Enquiry: You must provide the details of your enquiry. If you have a supporting document, you may attach it. The maximum file size allowed is 5 MB. The following file types are accepted: gif, png, jpg, jpeg, doc, docx, xls, xlsx, txt, pdf, m4a, m4b, m4p, m4v, m4r, 3gp, mp4, aac, mp3, m2a, m3a, mp2, mp2a, mpga, mpg4, mp4v, wav, flc, oga, ogg, spx, aif, aiff, aifc, aff.

Once you have read and accepted the Privacy Policy, you may submit your enquiry.

2.4. Submitting a Report (Whistleblowing)

The whistleblower has the option to request a face-to-face meeting. To do so, they must select the option **Report (Whistleblowing) with Face-to-Face Meeting**.

You may choose to identify yourself or remain anonymous by selecting the appropriate option from the dropdown menu.

* Select communications category

Information (breach) ▼

Breach Information On Line

Breach Information in-person meeting

If you choose to provide your personal details, you must complete the fields for Full Name, Telephone Number, and Email Address.

Entity: You must indicate the entity related to the subject of the report, in this case, **BRITISH SCHOOL OF TENERIFE**.

If you choose to remain anonymous, the form fields requesting personal data will not appear.

Comment: In this field, you must enter the details of the request being made.

Once you have read and accepted the Privacy Policy, you may submit the request for a face-to-face meeting.

The whistleblower also has the option to complete a questionnaire with the specific details of the report via a configurable form. To do so, they must select the **Report (Whistleblowing) Online** option.

You may choose to identify yourself or remain anonymous by selecting the appropriate option from the dropdown menu.

If you choose to provide your personal details, you must complete the fields for Full Name, Telephone Number, and Email Address.

If you choose to remain anonymous, the form fields requesting personal data will not appear.

The whistleblower can select the **category of the report** according to its nature.

You must also indicate your **relationship with BRITISH SCHOOL OF TENERIFE**.

You must provide a **detailed description of the facts** forming the subject of your report. This description should include all relevant details, being as specific as possible with regard to names, departments, people involved, documents, policies, locations, dates, times, etc.

If you have a document or file to support your report, you may upload common file types as listed below: Only files with the following extensions are permitted: gif, png, jpg, jpeg, doc, docx, xls, xlsx, txt, pdf, m4a, mp4a, m4b, m4p, m4v, m4r, 3gp, mp4, aac, mp3, m2a, m3a, mp2, mp2a, mpga, mpg4, mp4v, wav, flac, oga, ogg, spx, aif, aiff, aifc, aff. The maximum file size allowed for individual or combined uploads must not exceed 5MB.

Once you have read and accepted the Privacy Policy, you may submit your report (whistleblowing).

3. ACKNOWLEDGEMENT OF RECEIPT

The whistleblower will automatically receive an acknowledgement of receipt both on screen and via email, if an email address has been provided.

- **On-screen acknowledgement of receipt** will appear immediately after the report is submitted.

A unique code will be provided to allow access to track the report and to enter the follow-up form.

- **Acknowledgement of receipt via email.**

This includes a security layer to verify the email address.

EMAIL

VERIFICATION

To verify your email address and complete the process, please enter the activation code sent to: **your-email-address@domain.com** (Check your spam or junk folder in case it has been stored there)

Send

4. FOLLOW-UP OF THE REPORT AND COMMUNICATION FLOW

The whistleblower will be able to access the status of their report and will receive relevant updates via email.

Important: In the case of anonymous reports, no email communications will be sent, unless the whistleblower has provided an email address (e.g., a fictitious one).

You can check the status of your report or enquiry by entering the identification code provided at the time of submission.

You will be able to see the current stage of the process, a graphical representation of the workflow, and associated details.

Additionally, you may add further information after submitting your enquiry or report. All information sent will be recorded and available under **“Show report stage details”**.

5. ABOUT THE INFORMATION CHANNEL

The principles of the Information Channel guide and support professionals associated with **BRITISH SCHOOL OF TENERIFE** in their daily work, in their decision-making, behaviour, and the way they interact with employees, self-employed workers, students, legal representatives, collaborators, suppliers, volunteers, interns, trainees, as well as individuals whose employment or contractual relationship has ended or has not yet begun, and society in general.

This is an **accessible Information Channel** available to employees and stakeholders, allowing them to submit enquiries, requests, questions, suggestions, and complaints related to any aspect of **BRITISH SCHOOL OF TENERIFE**, or to report (whistleblow) anonymously or by name, any suspected irregularity or conduct contrary to the law or internal regulations.

All enquiries and reports will be handled with **the utmost confidentiality, privacy and security**, and can be submitted anonymously.

Types of situations that may be reported

Through this Information Channel, the following types of communications may be submitted:

A. Enquiries: Any possible incident related to **BRITISH SCHOOL OF TENERIFE**. This does not include messages such as advertising, job applications, commercial claims, etc.

B. Reports (Whistleblowing): Any suspected irregularity, act contrary to the law or internal rules; including potential irregularities related to accounting matters, audit issues, and/or aspects related to internal control.

Topics that can be addressed through enquiries or reports:

A. Enquiries

- **Accessibility:** Ensuring the removal of barriers when accessing a place or using a service.
- **Human Rights:** Rights inherent to all human beings regardless of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other condition. This category includes the protection of labour rights.

- **Integrity:** Based on the values of honesty, respect and transparency in professional interactions. Integrity refers to actions that reflect truthfulness and transparency, and stands in contrast to falsehood or deception.
- **Sustainable Innovation:** Innovation aimed at making a positive impact on the environment and society, using technology to achieve it. Innovation is created to improve reality or address a challenge.
- **Freedom of Expression:** The freedom to seek, receive and share information and ideas, whether orally, in writing, or via new information technologies, without prior censorship but subject to legal responsibilities.
- **Environment and Eco-efficiency:** Concerned with protecting the planet through eco-efficiency, which means providing goods and services at competitive prices, meeting human needs and quality of life while progressively reducing environmental impact and resource intensity throughout the life cycle, to a level that the planet can sustainably support.
- **Privacy:** Privacy and data protection are fundamental rights, allowing every individual to control the data that may identify them or make them identifiable.

B. Reports (Whistleblowing)

The various situations that may be reported can be categorised according to the following defined types:

- Labour conflict
- Working conditions
- Privacy/Information security
- Actions contrary to the integrity of **BRITISH SCHOOL OF TENERIFE**
- Asset fraud
- Favouritism
- Financial reporting
- Legal/regulatory non-compliance

This is an **Internal Information Channel** for confidential communication of incidents, available to everyone associated with **BRITISH SCHOOL OF TENERIFE** (staff, students, legal representatives, collaborators, volunteers, suppliers, etc.).

BRITISH SCHOOL OF TENERIFE appreciates receiving any communication regarding financial, accounting, commercial, ethical, or compliance-related misconduct, as this enables us to address issues and improve.

Reports must be submitted via the designated form, and **BRITISH SCHOOL OF TENERIFE** guarantees complete confidentiality, activating all necessary measures to prevent any form of retaliation.

This mechanism is also designed to receive enquiries related to questions that may arise regarding the application of internal rules and procedures of **BRITISH SCHOOL OF TENERIFE**.

At **BRITISH SCHOOL OF TENERIFE**, we are committed to transparency and therefore welcome such communications, which allow us to address issues and continuously improve as an organisation committed to regulatory compliance.

6. INFORMATION ON DATA PROTECTION

BRITISH SCHOOL OF TENERIFE ensures the confidentiality of personal data and complies with Data Protection regulations, specifically with the provisions of **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 (General Data Protection Regulation – GDPR), and **Organic Law 3/2018** of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), as well as any other applicable regulations.

All whistleblowers have the right to access, rectify, and delete their data, as well as other rights detailed in the additional information available in the **Privacy Policy**, or directly through **BRITISH SCHOOL OF TENERIFE** or the **Data Protection Officer (DPO)** by emailing: info@bstenerife.com / dpd@bstenerife.com.

7. RESPONSIBILITIES

It is the responsibility of the whistleblower to prove the accuracy of the information provided. **BRITISH SCHOOL OF TENERIFE** shall not be held responsible for the possible inaccuracy of the information or documentation received, the misuse of the Information Channel for purposes other than those intended, or communications sent regarding organisations unrelated to **BRITISH SCHOOL OF TENERIFE**. The organisation reserves the right to take action against those who maliciously or abusively misuse the Internal Information Channel.

8. VALIDITY

This **Information Channel Procedure** shall enter into force upon its approval by the **Governing Body / Board of Directors** of **BRITISH SCHOOL OF TENERIFE**. It was last updated on **12 June 2024**, and shall remain applicable until any subsequent revision or modification is made as deemed appropriate.