



WHISTLEBLOWER PROTECTION POLICY

Document Number: IAPUC/ETH/WBP/2025-001

Version: 1.0.0

Effective Date: 25 April 2025

Review Date: 25 April 2030 (or earlier as required)

Document Type: Policy

Classification: Public

Responsible Office: Office of the Secretariat

Approving Body: IAPUC Board of Directors

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Supersedes: None

Related Documents:

- IAPUC Bylaws (IAPUC/GOV/2025-001, Version 1.2.3)
- IQA Certification Academic Ethics and Integrity Code (IAPUC/ETH/2025-001, Version 1.0.1)
- Code of Conduct and Conflict of Interest Policy for Board Members (IAPUC/GOV/ETH/2025-001, Version 1.0.0)
- Disciplinary Procedures for Members (IAPUC/APP/DIS/2025-001, Version 1.0.0)
- IQA Certification Appeal, Complaint and Dispute Resolution Regulations (IAPUC/APP/COM/2025-001, Version 1.0.2)
- IAPUC Privacy Policy (IAPUC/LEG/PRV/2025-001, Version 1.0.1)
- IQA Document Preparation Specification (IAPUC/GOV/DOC-2025-001, Version 1.1.0)

Document Control

Version	Date	Author	Description of Changes	Approval
1.0.0	25 April 2025	Office of International Relations Coordination Affairs	Initial issuance	Board of Directors

Distribution List

- IAPUC Board of Directors (all members)
 - Accreditation Decision Committee (ADC)
 - IAPUC Secretariat
 - All IAPUC Members (Institutional and Individual)
 - All IAPUC Staff Members
 - IAPUC Standing Committees
 - IAPUC Legal Counsel
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Preamble

The International Association of Private Universities and Colleges (IAPUC) is committed to the highest standards of integrity, transparency, and accountability in all its operations. As a global quality assurance body serving private higher education institutions, IAPUC recognises that the early detection and reporting of misconduct, fraud, corruption, and other unethical practices are essential to safeguarding its mission and reputation.

Whistleblowers—individuals who report suspected wrongdoing in good faith—play a

vital role in protecting the integrity of IAPUC and its members. They often take personal and professional risks to expose misconduct. It is therefore incumbent upon IAPUC to create a safe, confidential, and supportive environment that encourages reporting and protects whistleblowers from retaliation.

This Whistleblower Protection Policy (the “Policy”) establishes:

- The scope of conduct that should be reported;
- The internal and external channels for making reports;
- The procedures for handling reports, including investigation and follow-up;
- The confidentiality and anonymity protections available;
- The measures to protect whistleblowers from retaliation;
- The remedies and sanctions for violations of this Policy.

This Policy is adopted pursuant to Article [X] of the IAPUC Bylaws and shall be read in conjunction with the *Code of Conduct and Conflict of Interest Policy for Board Members* (IAPUC/GOV/ETH/2025-001), the *Academic Ethics and Integrity Code for IQA Certification* (IAPUC/ETH/2025-001), the *Disciplinary Procedures for Members* (IAPUC/APP/DIS/2025-001), and the *IQA Certification Appeal, Complaint and Dispute Resolution Regulations* (IAPUC/APP/COM/2025-001).

Part I: General Provisions

Article 1: Purpose and Scope

1.1 This Policy aims to encourage the reporting of suspected wrongdoing within IAPUC and its member institutions by providing clear channels for reporting, ensuring confidentiality, and protecting whistleblowers from retaliation.

1.2 This Policy applies to:

- All IAPUC staff members (full-time, part-time, temporary, and contract);
- All members of IAPUC’s governing bodies, including Board members, committee members, and the Accreditation Decision Committee (ADC);
- All institutional and individual members of IAPUC;
- External stakeholders, including accreditation applicants, peer reviewers, consultants, and vendors, to the extent that they report matters concerning IAPUC or its members.

1.3 This Policy does not replace or supersede other reporting mechanisms (e.g., the *IQA Certification Appeal, Complaint and Dispute Resolution Regulations*) but provides a dedicated framework for whistleblowing.

Article 2: Definitions

For the purposes of this Policy:

2.1 **“Whistleblower”** means any individual who makes a report of suspected wrongdoing in good faith, whether internally or externally, and regardless of whether the report is substantiated.

2.2 **“Wrongdoing”** means any act or omission that:

- Is unlawful or fraudulent;
- Constitutes a breach of IAPUC’s Bylaws, codes of conduct, or other regulations;
- Involves misuse of IAPUC resources or funds;
- Creates a significant risk to health, safety, or the environment;
- Involves gross mismanagement, abuse of authority, or substantial waste of resources;
- Constitutes a conflict of interest or breach of fiduciary duty;
- Involves obstruction of IAPUC’s accreditation or quality assurance processes;
- Constitutes academic fraud, plagiarism, or falsification of data;
- Is otherwise contrary to the public interest or the mission of IAPUC.

2.3 **“Retaliation”** means any adverse action taken against a whistleblower because they have made a report, including but not limited to:

- Dismissal, demotion, suspension, or other adverse employment action;
- Harassment, intimidation, or threats;
- Unjustified disciplinary action;
- Exclusion from opportunities or benefits;
- Damage to reputation or professional standing;
- Any other action that would dissuade a reasonable person from making a report.

2.4 **“Protected Disclosure”** means a report of wrongdoing made in good faith, regardless of whether the wrongdoing is ultimately proven.

2.5 **“Investigating Officer”** means the person or persons appointed to investigate a report under this Policy.

Article 3: Good Faith Requirement

3.1 This Policy protects whistleblowers who make reports in good faith, meaning they have reasonable grounds to believe that the information disclosed is true and that it relates to wrongdoing as defined herein.

3.2 Reports made maliciously, frivolously, or with knowledge that the information is false shall not be protected under this Policy and may result in disciplinary action against the reporting individual, in accordance with the *Disciplinary Procedures for*

Members (where applicable) or staff disciplinary procedures.

Article 4: Relationship to Other IAPUC Policies

4.1 This Policy shall be interpreted in harmony with the following instruments:

- The IAPUC Bylaws (IAPUC/GOV/2025-001);
- The *Code of Conduct and Conflict of Interest Policy for Board Members* (IAPUC/GOV/ETH/2025-001);
- The *Academic Ethics and Integrity Code for IQA Certification* (IAPUC/ETH/2025-001);
- The *Disciplinary Procedures for Members* (IAPUC/APP/DIS/2025-001);
- The *IQA Certification Appeal, Complaint and Dispute Resolution Regulations* (IAPUC/APP/COM/2025-001);
- The *IAPUC Privacy Policy* (IAPUC/LEG/PRV/2025-001).

4.2 Where a report under this Policy also constitutes a complaint under other procedures, the Secretariat shall determine the most appropriate channel and may consolidate the processing.

Article 5: Guiding Principles

5.1 **Encouragement:** IAPUC actively encourages the reporting of suspected wrongdoing in good faith.

5.2 **Confidentiality:** The identity of the whistleblower shall be protected to the fullest extent permitted by law.

5.3 **Non- Retaliation:** No person shall suffer retaliation for making a protected disclosure.

5.4 **Fairness:** Whistleblowers and persons accused of wrongdoing shall be treated fairly and with respect for their rights.

5.5 **Proportionality:** Responses to reports shall be proportionate to the gravity of the matter.

Part II: Scope of Protection and Who Is Protected

Article 6: Protected Persons

6.1 This Policy protects:

- Current and former employees of IAPUC;

- Board members, committee members, and ADC members;
- Members (institutional and individual);
- Applicants for membership or accreditation;
- Contractors, consultants, and vendors;
- Peer reviewers and accreditation panel members;
- Any other person who makes a protected disclosure concerning IAPUC or its members.

6.2 The protection extends to individuals who assist in the investigation, provide evidence, or otherwise cooperate with an inquiry.

Article 7: Protected Disclosures

7.1 The following types of disclosures are protected:

- Disclosures made internally to IAPUC (through the channels specified in Article 9);
- Disclosures made externally to competent authorities (e.g., law enforcement, regulators) where the disclosure is made in accordance with applicable law and where the whistleblower has reasonable grounds to believe that the wrongdoing is serious;
- Disclosures made to a legal advisor in the course of seeking advice.

7.2 Disclosures made solely for personal gain, without a reasonable basis, or in breach of confidentiality obligations (other than those required for reporting) are not protected.

Article 8: Protection of Third Parties

8.1 IAPUC shall also protect the identity and interests of individuals who are implicated in a report but are later found to have no involvement in wrongdoing.

8.2 Unsubstantiated allegations shall not be used to harm the reputation of any person.

Part III: Reporting Channels and Procedures

Article 9: Internal Reporting Channels

9.1 Whistleblowers are encouraged to report wrongdoing through the following internal channels:

(a) To the IAPUC Secretariat:

- Email: whistleblower@iapuc.org (dedicated and secure email address)
- Mail: IAPUC Secretariat, [Address], marked “Confidential – Whistleblower Report”

(b) To the Chair of the Board of Directors (for matters involving the Secretariat or senior staff):

- Email: boardchair@iapuc.org (marked “Confidential”)

(c) To the Head of the Office of International Relations Coordination Affairs (or equivalent, for matters of an international or diplomatic nature).

9.2 Reports should ideally be made using the *Whistleblower Report Form* (Annex A), but any clear written description is acceptable.

9.3 The Secretariat shall ensure that all reports are logged, acknowledged, and directed to the appropriate investigative authority.

Article 10: External Reporting

10.1 In exceptional circumstances—where internal reporting is not practicable, where the whistleblower reasonably fears retaliation, or where the matter is of such gravity that immediate external reporting is warranted—a whistleblower may report directly to competent external authorities, such as:

- Law enforcement agencies;
- Regulatory bodies;
- Anti- corruption or ombudsman offices;
- Relevant professional or ethical oversight bodies.

10.2 Whistleblowers are encouraged to inform IAPUC of any external reporting, unless doing so would compromise their safety or the effectiveness of the investigation.

Article 11: Initial Processing of Reports

11.1 Upon receipt of a report, the Secretariat shall:

- Acknowledge receipt within **5 working days**;
- Provide the whistleblower with an initial assessment and the expected timeframe for further action;
- Determine whether the report falls within the scope of this Policy;
- Assign a unique reference number and record the report in a secure, confidential log.

11.2 The Secretariat shall conduct an initial triage to assess:

- The credibility and seriousness of the allegations;
- Whether the report is made in good faith;

- Whether there is any immediate risk to persons or property that requires urgent action.

Article 12: Preliminary Assessment

12.1 Within **15 working days** of receipt, the Secretariat shall determine whether the report:

- Is to be dismissed as manifestly unfounded or outside the scope of this Policy;
- Can be resolved through management action (e.g., correction of administrative errors);
- Requires a formal investigation.

12.2 The whistleblower shall be informed of the outcome of the preliminary assessment and the reasons for the decision.

Article 13: Referral to Other Procedures

13.1 Where the report concerns a matter that is more appropriately handled under other IAPUC procedures (e.g., *Disciplinary Procedures for Members*, *Code of Conduct* complaints), the Secretariat shall refer the report to the relevant process and inform the whistleblower accordingly.

13.2 Such referral shall not prejudice the whistleblower's protection under this Policy.

Part IV: Confidentiality and Anonymity

Article 14: Confidentiality

14.1 The identity of the whistleblower and the content of the report shall be kept confidential to the fullest extent possible, consistent with the need to conduct a fair investigation and to comply with legal obligations.

14.2 Access to whistleblower information shall be restricted to:

- The Investigating Officer(s);
- The Secretariat (designated personnel);
- The Board Chair or ADC Chair, where their involvement is necessary;
- Legal counsel, where required;
- The accused individual, to the extent necessary for them to respond to the allegations, but only after the whistleblower's identity has been anonymised, unless the whistleblower consents to disclosure.

14.3 Any person who breaches confidentiality shall be subject to disciplinary action.

Article 15: Anonymity

15.1 Whistleblowers may report anonymously (i.e., without revealing their identity).

15.2 Anonymous reports shall be investigated to the extent that the information provided is sufficiently detailed and credible to allow for investigation.

15.3 The Secretariat shall take steps to protect the anonymity of the whistleblower throughout the process. However, anonymity may limit the ability to investigate fully or to provide feedback to the whistleblower.

15.4 If an anonymous report lacks sufficient detail, the Secretariat may decide not to investigate.

Article 16: Data Protection

16.1 All personal data collected in connection with whistleblowing reports shall be processed in accordance with the *IAPUC Privacy Policy* (IAPUC/LEG/PRV/2025-001) and applicable data protection laws, including the GDPR, PIPL, and CCPA.

16.2 The Secretariat shall maintain a secure database of whistleblower reports, accessible only to authorised personnel.

Part V: Investigation and Follow- Up

Article 17: Appointment of Investigating Officer

17.1 Where a formal investigation is warranted, the Secretariat shall appoint an Investigating Officer(s) with appropriate expertise and no conflict of interest.

17.2 In cases involving the Secretariat or senior staff, the investigation shall be conducted by an external investigator appointed by the Board Chair.

17.3 The Investigating Officer shall have full access to relevant documents and personnel, subject to legal and confidentiality constraints.

Article 18: Conduct of Investigation

18.1 The investigation shall be conducted fairly, impartially, and expeditiously.

18.2 The Investigating Officer shall:

- Interview the whistleblower (if known) and any witnesses;
- Examine relevant documents and records;
- Give the accused person(s) a reasonable opportunity to respond to the allegations;
- Consider any exculpatory evidence;

- Maintain confidentiality throughout.

18.3 The investigation shall be completed within **60 days** of appointment, unless extended for good cause by the Secretariat (with notice to the whistleblower and the accused).

Article 19: Investigation Report

19.1 The Investigating Officer shall prepare a written report that contains:

- A summary of the allegations;
- The investigative steps taken;
- Findings of fact;
- Conclusions as to whether wrongdoing has been established, on a balance of probabilities;
- Recommendations for action.

19.2 The report shall be submitted to the Secretariat and, where applicable, to the appropriate decision-making body (e.g., the Disciplinary Committee, the Board).

Article 20: Feedback to the Whistleblower

20.1 The whistleblower shall be informed, to the extent permitted by confidentiality requirements:

- That the investigation has concluded;
- Of the outcome in general terms (e.g., whether action has been taken);
- Of any recommendations arising from the investigation.

20.2 The whistleblower shall not be entitled to access the full investigation report, but may request general feedback.

20.3 The whistleblower shall be informed of their right to appeal or to seek external remedies if they are dissatisfied with the handling of the report.

Part VI: Protection Against Retaliation

Article 21: Prohibition of Retaliation

21.1 No person shall take any retaliatory action against a whistleblower because they have made a protected disclosure.

21.2 Retaliation is itself a serious disciplinary offence and may be subject to the full range of sanctions under the *Disciplinary Procedures for Members* or staff disciplinary procedures.

Article 22: Presumption of Retaliation

22.1 If an adverse action is taken against a whistleblower within **one (1) year** of a protected disclosure, there shall be a rebuttable presumption that the action was retaliatory, unless the employer or IAPUC can demonstrate by clear and convincing evidence that the action was taken for legitimate reasons unrelated to the disclosure.

Article 23: Measures to Prevent Retaliation

23.1 IAPUC shall take all reasonable steps to prevent retaliation, including:

- Ensuring that managers and supervisors are aware of this Policy and trained in whistleblower protection;
- Monitoring the treatment of whistleblowers after their disclosure;
- Providing interim protection measures where necessary (e.g., temporary transfer, change of reporting lines);
- Promptly investigating any complaints of retaliation.

Article 24: Reporting Retaliation

24.1 A whistleblower who believes they have been subjected to retaliation may report the matter to the Secretariat or directly to the Board Chair.

24.2 Reports of retaliation shall be investigated with the same confidentiality and urgency as the original report.

24.3 If retaliation is found to have occurred, IAPUC shall take appropriate remedial action (see Article 26).

Part VII: Remedies and Sanctions

Article 25: Remedies for Whistleblowers

25.1 Where a whistleblower has suffered retaliation, IAPUC shall take steps to remedy the harm, which may include:

- Reinstatement (for employees or Board members, where applicable);
- Compensation for financial losses;
- Restoration of lost opportunities or benefits;
- Issuance of a formal apology or correction of records;
- Any other measure appropriate to the circumstances.

25.2 The whistleblower may also pursue external remedies (e.g., through labour tribunals, courts) without prejudice to their rights under this Policy.

Article 26: Sanctions for Violations

26.1 Any person found to have retaliated against a whistleblower, or to have breached confidentiality, or to have made a frivolous or malicious report, shall be subject to disciplinary action in accordance with the *Disciplinary Procedures for Members* (for members) or staff disciplinary procedures (for staff).

26.2 Sanctions may include:

- Written reprimand;
- Censure;
- Suspension or removal from office (Board members);
- Termination of employment or membership;
- Referral to external authorities for legal action, where appropriate.

Article 27: Protection of Accused Persons

27.1 This Policy also protects the rights of persons accused of wrongdoing. Accusations shall be investigated fairly, and no adverse action shall be taken against an accused person unless and until wrongdoing is established.

27.2 If an investigation concludes that an allegation was not substantiated, the accused person's record shall be cleared, and the allegation shall not be used to prejudice them.

Part VIII: Appeals and Grievances

Article 28: Appeals

28.1 A whistleblower who is dissatisfied with the handling of their report—including the decision not to investigate, the outcome of the investigation, or the handling of a retaliation complaint—may appeal to the Independent Appeals and Arbitration Committee, in accordance with the *IQA Certification Appeal, Complaint and Dispute Resolution Regulations* (IAPUC/APP/COM/2025-001).

28.2 The appeal must be filed within **30 days** of the receipt of the decision being appealed.

28.3 The Committee's decision shall be final and binding on all parties.

Part IX: Miscellaneous Provisions

Article 29: Record- Keeping

29.1 The Secretariat shall maintain secure records of all whistleblower reports, investigations, and outcomes, in accordance with the *IQA Certification Archives and Data Retention Management Regulations* (IAPUC/ARCH/2025-001).

29.2 Records shall be retained for a period of **ten (10) years** after the conclusion of the matter, subject to applicable data protection laws.

Article 30: Training and Awareness

30.1 IAPUC shall ensure that all staff, Board members, and relevant stakeholders are made aware of this Policy and its procedures.

30.2 Training shall be provided on:

- The importance of whistleblowing;
- The channels for reporting;
- The protection available;
- The prohibition on retaliation.

Article 31: Review and Amendment

31.1 This Policy shall be reviewed at least once every **five (5) years** by the Board.

31.2 Amendments may be proposed by any Board Member or by the Secretariat and shall be adopted by a two- thirds majority of the Board.

31.3 All amendments shall be documented in the Document Control table, with a new version number reflecting the revision.

Annex A: Whistleblower Report Form

(To be completed by the whistleblower, preferably electronically)

IAPUC WHISTLEBLOWER REPORT FORM

Date of Report: _____

Your Name (optional, if anonymous, leave blank): _____

Contact Information (optional): Email: _____ Phone: _____

Are you reporting as:

- ☐ IAPUC staff member
- ☐ Board/Committee member
- ☐ Institutional member

- ☐ Individual member
- ☐ External stakeholder (e.g., applicant, peer reviewer)
- ☐ Other (please specify): _____

1. Nature of the Wrongdoing Alleged

Please describe in as much detail as possible the suspected wrongdoing, including:

- What happened?
- Who was involved?
- When and where did it occur?
- How did you become aware of it?
- Are there any witnesses or documents?

2. Supporting Evidence

Please list any documents, recordings, emails, or other evidence that supports your report. If you have physical evidence, please state whether you are willing to share it.

3. Previous Reporting (if any)

Have you reported this matter to anyone else (e.g., supervisor, manager, external authority)? If yes, please provide details.

4. Conflict of Interest

Do you have any personal interest in the matter (e.g., personal relationship with the accused, financial interest)? If so, please describe.

5. Preferred Anonymity

- ☐ I wish to remain anonymous.
- ☐ I consent to my identity being disclosed to the Investigating Officer and, if necessary, to the accused person(s) during the investigation.

6. Declaration

I declare that the information provided is true and accurate to the best of my knowledge. I understand that making a report in bad faith may result in disciplinary action.

Signature (if not anonymous): _____

Date: _____

Please submit this form to whistleblower@iapuc.org or mail it to the IAPUC Secretariat (marked "Confidential").

Annex B: Acknowledgement of Report Template

(To be issued by the Secretariat to the whistleblower)

IAPUC ACKNOWLEDGEMENT OF WHISTLEBLOWER REPORT

Reference Number: IAPUC/WB/2025/ _____

Date: _____

To: [Whistleblower Name (if known) or "Anonymous"]

This letter acknowledges receipt of your whistleblower report dated [date] regarding [brief description].

We confirm that:

- Your report has been received and recorded in our confidential system.
- It has been assigned reference number [_____].
- We will conduct an initial assessment and will inform you of the outcome within **15 working days**.
- Your identity will be treated confidentially in accordance with the *Whistleblower Protection Policy*.

If you have any questions or need to provide additional information, please contact the Secretariat at whistleblower@iapuc.org quoting the reference number.

Please note that you are protected from retaliation under the Policy. If you experience any adverse action, please report it immediately.

Thank you for your commitment to the integrity of IAPUC.

Yours sincerely,

Secretariat

IAPUC

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