

	 AL NOOR REHABILITATION & WELFARE ASSOCIATION FOR PEOPLE OF DETERMINATION النور جمعية النور لرعاية وتأهيل أصحاب الهمم		
	POLICY		
	WHISTLEBLOWING POLICY		
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WHISTLEBLOWING POLICY

This policy stands alone and sits alongside the Employee Handbook (POL-73). It replaces nothing in the Handbook's Grievance Redressal section, which continues to cover personal employment complaints.

1. PURPOSE AND POLICY STATEMENT

Al Noor encourages anyone who sees wrongdoing to report it early, safely and without fear. Concerns raised in good faith will be taken seriously and looked into fairly, and the person raising them will be protected.

This policy puts into practice the Handbook's commitment to observe all UAE laws and to uphold "high standards of business ethics and professional integrity".

The policy aims to:

Give clear, confidential routes to report suspected wrongdoing, including routes that bypass line management.

Protect whistleblowers from retaliation of any kind.

Make sure every report is acknowledged, assessed and, where needed, investigated independently.

2. SCOPE

Anyone connected with Al Noor may raise a concern under this policy:

Full-time, part-time and temporary employees.

Contractual employees, consultants, trainees, interns, volunteers and visitors.

Former employees, about matters they learned while working at Al Noor.

The policy covers wrongdoing by any employee at any level, including the Director, Program Leaders and HODs. It applies to conduct on Al Noor premises, at off-site activities, in transport and online.

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3. DEFINITIONS

Term	Meaning
Whistleblowing	Reporting a reasonable concern about wrongdoing that affects others, Al Noor or the public.
Whistleblower	The person who raises the concern.
Good faith	The whistleblower honestly and reasonably believes the information is true, even if it later proves mistaken.
Retaliation	Any harmful act taken because someone raised a concern, such as dismissal, demotion, warning letters, withheld promotion, schedule or duty changes, exclusion, harassment or threats.
Whistleblowing Officer	The person appointed by the Director to receive and manage reports. Default: HR function head.
Whistleblowing Committee	Director, Whistleblowing Officer and one Program Leader not involved in the matter. It oversees investigations and decides outcomes. Where a concern involves the Director, the Chair of the Board, or a Board Member nominated by the Chair, takes the Director's place (see Section 5).

4. WHAT TO REPORT

Any concern that a person reasonably believes shows past, current or likely wrongdoing should be reported. Proof is not required; reasonable suspicion is enough. The person raising the concern should not investigate the matter themselves.

Examples of reportable concerns:

Abuse, neglect, mistreatment or unsafe restraint of any student or client.

Breach of student privacy, including misuse of photos or videos.

Fraud, theft, bribery, kickbacks, or accepting gifts without the Director's approval.

Misuse of donations, sponsorship or grant funds, or falsified financial records, invoices or attendance.

			
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Undisclosed conflicts of interest, including in recruitment, procurement or the employment of relatives.

Breaches of UAE law or regulatory requirements.

Dangers to health and safety of students, staff or visitors.

Serious breaches of the Code of Conduct, harassment or discrimination affecting others.

Data or confidentiality breaches involving student, employee or financial records.

Deliberate concealment of any of the above.

Not covered: Personal complaints about an employee's own pay, leave, appraisal, workload or relationship with their supervisor are handled under the Grievance Redressal policy.

5. HOW TO RAISE A CONCERN

A concern may be raised through whichever channel the whistleblower feels safest with. No one is required to report to a person they believe is involved.

Channel	When to use it	Contact
HOD or Program Leader	First choice where the whistleblower is comfortable and the HOD or Program Leader is not involved	In person / by email / QR Code
Whistleblowing Officer	Default channel for all concerns	In person / by email / QR Code
"Your Voice Matters" QR code	Quick online reports, named or anonymous	Scan the QR code displayed in staff rooms; reports go to the Whistleblowing Officer only
Chair of the Board	Concerns involving the Director	By email

A concern may be raised verbally, in writing by plain email, through the QR code or by using the Whistleblowing Report Form (Appendix A). It should include what happened, when and where, who was involved, any witnesses or documents, and how the whistleblower came to know. Consistent with the Handbook's rule on formal communication, WhatsApp and social media must not be used to report.

			
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Concerns involving the Director. These are reported to the Chair of the Board. The Director takes no part in handling the concern, and the Chair, or a Board Member nominated by the Chair, takes the Director's place on the Whistleblowing Committee.

External reporting. Staff should normally use internal channels first. A whistleblower may report directly to the relevant authority where the law requires it, where there is a reasonable fear of retaliation or a cover-up, or where an internal report has not been acted on.

6. CONFIDENTIALITY AND ANONYMOUS REPORTS

The whistleblower's identity will be protected. It will be shared only with the people who need it to investigate, and only with the whistleblower's consent, unless the law or a court requires disclosure.

Everyone involved in handling a report must keep it confidential. Breaching this is a disciplinary offence.

Reports and investigation files are kept separately from personnel files and are not shared with the person named.

Anonymous reports are accepted. Unlike the Grievance Redressal procedure, which does not normally accept anonymous complaints, this policy does, through the "Your Voice Matters" QR code. Anonymous reports can be harder to investigate because follow-up questions cannot be asked and feedback cannot be given. Anonymous reports should therefore include as much detail and evidence as possible. A whistleblower may set up an anonymous email address to allow two-way contact.

7. PROTECTION FROM RETALIATION

No one will suffer any detriment for raising a concern in good faith, even if it turns out to be mistaken. This protection also covers anyone who gives evidence or helps an investigation.

Retaliation, threats or attempts to discover a whistleblower's identity are serious misconduct. They will lead to disciplinary action up to and including dismissal under the Handbook's Disciplinary section.

			
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Anyone who believes they are being retaliated against should report it straight away to the Whistleblowing Officer or the Director (or the Chair of the Board, if the Director is involved). It will be investigated as a new concern.

Raising a concern does not protect a person from action for their own wrongdoing, although their cooperation will be taken into account.

8. HOW A CONCERN IS HANDLED

Every concern is acknowledged within 24 hours, in line with the Handbook's grievance standard, and normally resolved within 30 working days.

1. **Receive and acknowledge (within 24 hours).** The Whistleblowing Officer logs the report in the confidential register and confirms receipt to the whistleblower, where contact details are known. Any safeguarding concern about a student is referred the same day under the Centre's safeguarding procedure.
2. **Initial assessment (within 5 working days).** The Officer decides whether the matter falls under this policy, needs urgent action, must be reported to an authority, or belongs in another procedure such as Grievance Redressal.
3. **Appoint an investigator.** The Whistleblowing Committee appoints an investigator who is independent of the matter and of the people involved. For serious or senior matters, the Committee may use an external investigator. Any Committee member with a conflict of interest steps aside.
4. **Investigate (within 30 working days).** The investigator gathers documents and interviews the whistleblower, witnesses and the person concerned. The person concerned is told the allegations and given a fair chance to respond. Findings are based on the balance of probabilities.
5. **Decide and act.** The Committee reviews the report and decides the outcome: no case to answer, process improvements, disciplinary action under the Handbook, recovery of losses, or referral to the police or another authority.
6. **Feed back (within 10 working days of the decision).** The whistleblower is told that the matter has been concluded and, where appropriate, the general outcome.

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Confidentiality and legal limits may prevent sharing details, such as disciplinary action taken against another person.

If an investigation needs longer, the Officer informs the whistleblower and gives a revised date. A whistleblower who is unhappy with how the concern was handled may escalate it to the Director, or to the Chair of the Board if the Director is involved.

9. FALSE OR MALICIOUS REPORTS

Al Noor assumes every concern is raised in good faith. No action will be taken against someone whose honest concern is not confirmed.

Knowingly making a false allegation, or making one to harm another person or for personal gain, is misconduct. It will be dealt with under the Handbook's Disciplinary section. The person wrongly accused will be supported and, if they wish, told the outcome.

10. ROLES AND RESPONSIBILITIES

Role	Responsibilities
Director	Approves the policy; appoints the Whistleblowing Officer; chairs the Whistleblowing Committee.
Chair of the Board	Receives concerns involving the Director and takes, or nominates a Board Member to take, the Director's place on the Committee for those concerns.
Whistleblowing Officer (HR)	Receives and logs reports; manages the QR code reports; runs the initial assessment; keeps the whistleblower informed; maintains the register; reports to the Director.
Whistleblowing Committee	Appoints investigators; reviews findings; decides outcomes and actions.
All employees	Report genuine concerns promptly; cooperate with investigations; keep matters confidential; never retaliate.

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11. RECORDS, REGISTER AND REPORT

Register. The Whistleblowing Officer keeps a confidential register of every concern: reference number, date received, category, channel, investigator, key dates, outcome and actions.

Retention. Whistleblowing files are kept securely, with access limited to the Committee, for 5 years after the case closes, matching the Handbook's retention period for personal files. Files involving a child, legal proceedings or a regulator are kept for as long as required by law.

Reporting. The Officer gives the Director a quarterly summary, with numbers, categories, timeliness and lessons learned. Summaries never identify whistleblowers. Concerns involving the Director are reported to the Chair of the Board.

			
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APPENDIX A - WHISTLEBLOWING REPORT FORM

Field	Details
Name and contact (optional)	
Date of report	[DD/MM/YYYY]
What happened	
Date(s), time(s) and location	
People involved	
Witnesses	
Evidence or documents available	
How the matter came to the reporter's attention	
Reported elsewhere? If so, to whom and when	
Does this concern the safety of a student? (Yes / No)	

Submit to the Whistleblowing Officer, the "Your Voice Matters" QR code or any channel in Section 5.

				
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Appendix – Amendment History & Authorisation

Revision No	Description of Change	Issue Date	Authorised By
00	First Issue	05 October 2026	Director