



## Policies and Procedures

Operations Department

**Whistleblowing Policy**

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## Whistleblowing Policy

### 1. Purpose and Scope

The purpose of this policy is to outline the rights and responsibilities of all Future Focus Ltd. employees with regarding to whistleblowing procedures and local legislation in Malta. This policy applies to all staff, including lecturers, employed by Future Focus Ltd. as well as third party organisations or individuals contracted by Future Focus Ltd.

### 2. Policy

This policy has been developed in line with the *Malta Whistleblower Act – Chapter 527 – September 2013*. A whistleblower is defined as an employee of Future Focus Ltd. who reports an activity that they consider to be illegal or dishonest to other staff, students, or other contractors. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Conduct that may be regarded as illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is obliged to contact their immediate supervisor or the Office of Human Resources. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.



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## Quality Assurance Policies and Procedures

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. As far as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defence. Future Focus Ltd. will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the Office of Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. The Office of Human Resources is responsible for investigating any instances of whistleblowing made by any staff.