



Whistle-blowing Policy

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1 Overview

- 1.1 A decision to blow the whistle should only be taken in cases of extremely serious matters. This policy provides members of our community an avenue within the School to raise serious concerns.
- 1.2 This policy applies to all employees, students, officers, governors, consultants, contractors, volunteers, work placement students, interns, casual workers, agency workers, parents and visitors to the School.
- 1.3 It does not preclude nor absolve the whistle-blower from reporting the matter to the police/authorities where they wish to do so or where such a duty to report exists at law.

2 Guiding Principles

- 2.1 The whistle-blowing procedure enables anyone to express a legitimate concern regarding suspected malpractice within the School. It is separate from the School's procedures regarding grievances and complaints.
- 2.2 This policy guides the whistle-blower on how to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of students.
- 2.3 Concerns about safeguarding and child protection should, in the first instance, be managed under the Safeguarding and Child Protection Policy.
- 2.4 The whistle-blowing procedure should not be used to raise grievances about personal circumstances in the workplace.

3 Objectives of this Policy

- 3.1 To encourage members of our community to feel confident in raising serious concerns and to question and act upon concerns about practice.
- 3.2 To provide avenues for members of our community to raise those concerns and receive feedback on any action taken.
- 3.3 To ensure that any individual who raises a concern receives a response and that they are aware of how to pursue their concerns if they are not satisfied with the outcome.
- 3.4 To reassure members of our community that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made their disclosure in good faith.

4 Definition of Whistle-blowing

- 4.1 Whistle-blowing is defined as raising a concern about a wrongdoing within an organisation.
- 4.2 The whistle-blowing policy is intended to cover major concerns or where there is a belief that procedures have not been appropriately adhered to. These include:
 - Conduct which is an offence or a breach of the law

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- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees
- Damage to the environment
- The unauthorised use of School funds
- Possible fraud and corruption
- Sexual or physical abuse of individuals
- Other unethical conduct

5 Protection from Reprisal or Victimisation

- 5.1 We recognise that the decision to report a concern can be a difficult one and we make every effort to support the individual making the disclosure through the process.
- 5.2 We will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect employees and other individuals when they raise a concern in good faith.
- 5.3 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary procedures already in progress against the individual making the disclosure.

6 Confidentiality

- 6.1 Anyone wishing to raise a concern under this procedure is entitled to have the matter treated confidentially as far as it is possible to do so. We will make every effort to keep the reporter's identity confidential. If it is necessary for the investigator to know the individual's identity, the need for disclosure will be discussed with the individual in advance.
- 6.2 Individuals are encouraged to express their concern in writing rather than anonymously wherever possible so that we can establish that the allegations are credible. Proper investigation may be more difficult or impossible if we cannot obtain further information from the reporting individual when needed. Individuals worried about possible reprisals if their identity is revealed should make their concerns known when making their disclosure.
- 6.3 If there is evidence of criminal activity, the Police may be informed.

7 Untrue Allegations

- 7.1 If an individual makes an allegation in good faith, but it is not upheld following an investigation, no action will be taken against them.
- 7.2 If an individual makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

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8 The Responsible Officer

- 8.1 The Chair of the Staff Sub-Committee has overall responsibility for the maintenance and operation of this policy. The Chair maintains a record, through the Company Secretary, of all concerns raised and records the outcome in a manner that does not compromise the reporting individual's confidentiality. The Chair will report as necessary to the Board of Governors.

9 Making a Report

- 9.1 Where possible, suspicions should first be reported to the Director of Human Resources.
- 9.2 If the individual feels uncomfortable reporting their suspicions to the Director of Human Resources, the report may be made to the Chief Executive Officer.
- 9.3 If the individual feels uncomfortable reporting their suspicions to either of the above options, they may then contact the Chair of the Staff Sub Committee through the Company Secretary at cosec@tts.edu.sg to register the concern.
- 9.4 If the concern involves the Chair of the Staff Sub Committee, the individual may first raise that concern to the Chair of the Board of Governors.
- 9.5 Parents, visitors or other individuals should report their suspicions to the Director of Human Resources, the relevant Head of School or to the Chief Executive Officer.

10 Response from the School

- 10.1 The School will respond to concerns raised and, where appropriate, they may:
- be investigated internally by the person who received the report
 - be referred to the police
 - be referred for external investigation and/or review
- 10.2 In order to protect individuals and those accused of misdeeds or possible malpractice, we will make initial enquiries to decide whether an investigation is appropriate and, if so, what form it should take. Our overriding concern is the public interest.
- 10.3 Concerns or allegations that fall within the scope of specific procedures (for example, child protection issues) will normally be referred for consideration under those procedures.
- 10.4 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 10.5 An individual can expect a response detailing any action taken within **10 working days** of the School becoming aware of the disclosure. This response will include:
- Acknowledgment that the concern has been received
 - Indication of how the School proposes to deal with the matter
 - An estimation of how long it will take to provide a final response
 - Information regarding whether any initial enquiries have been made
 - Information on staff support mechanisms
 - Whether further investigations will take place and if not, why not

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- 10.6 The extent of contact between the officers considering the issue and the individual who has raised the issue will depend on the nature of the matter raised, the potential difficulties involved and the clarity of the information provided. If necessary, we will seek further information from the individual.
- 10.7 Where any meeting is arranged, off-site if preferred, the individual can be accompanied by a union or professional association representative or a friend.
- 10.8 We will take steps to minimise any difficulties the individual may experience as a result of raising a concern. If they are required to give evidence in criminal or disciplinary proceedings, we will arrange for them to receive advice about the procedure.
- 10.9 The reporting individual will understandably want to know that the matter has been properly addressed so, subject to legal constraints, we will advise them of the outcome of any investigation.

11 Review/Appeal

- 11.1 If the reporting individual is not satisfied with the action taken, they can raise the matter directly with the Chair of the Board of Governors through the Formal and Independent Review / Appeal Request process.

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