

# Whistleblowing Policy

## 1. Policy Statement

UWCSEA has a values based culture that encourages openness, integrity and accountability. This policy and procedure is designed to guide individuals of the College community and external parties to raise concerns through an established process of reporting.

## 2. Policy Rationale

This policy aims to provide clarity and consistency on the process of raising a concern without having fear of reprisals when whistleblowing in good faith.

## 3. Scope of Policy

This Policy is made available to all members of the College community through the College internal portal and is also made available publicly on the College website for external parties.

3.1 The following individuals (current or in a former capacity) may file a complaint under this Whistleblower Policy:

- 1) Staff members- Full time or Part time staff.
- 2) Parents of College students - existing or former students.
- 3) Allied staff - persons who are not full time or part time employees and are associated with the College and/ its employees for the purpose of providing goods or services either directly or indirectly. For e.g; Independent External Contractors, Shadow Teachers, Volunteers, Interns.
- 4) Vendor - external individual or third party organisation that provides goods or services to the College, either paid or unpaid (eg volunteers).

### 3.2 Scope of Concern

3.2.1 The scope of concern may include but not limited to :-

- 1) Breach of UWCSEA's Code of conduct;
- 2) Fraud - behaviours of concern relating to honesty or integrity or misrepresentation, including internal fraud, theft, bribery and corruption, dissimulation of a fraud;
- 3) Conflict of interest, including those relating to outside business interests, relationships, improper assessment, payments and donations;

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**Approval Authority:** College Leadership Team

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- 4) Contractual Breach - Practices or behaviours of concern relating to compliance with policies, procedures or the law; Breaches of privacy or confidentiality, including student information;
- 5) Unethical behaviour that does not represent UWCSEA’s commitment, to do the right thing by its community members; abuse of power;
- 6) Health and Safety or environmental dangers or damage

## 3.3 Exclusions

3.3.1 While the College encourages the reporting of the above concern, not all types of concerns are intended to be covered by this Policy. Examples of areas that are generally not covered by this policy include:

### Exclusion 1 - Parent Concerns on student related matters

For current and former parents of College students, matters relating to the delivery of the student related services, should be channelled to the Head of Campus or the School Principals.

### Exclusion 2 - Personal Work-related Concerns

For employees of the College, reporting of matters relating to a grievance that directly affects their employment, whether in the current or former capacity, should be channelled to the HR designated Employment Relations Specialist or Director of Human Resource.

## 3.4 Ownership

3.4.1 The Board’s Audit and Risk Committee (ARC) has oversight of this policy. The Director of Human Resources (DHR) has the responsibility for the operations and processes required to execute this Policy including the receipt, investigation, review and resolution of cases.

## 4. Definitions

<b>Whistleblowing Case Officer (WCO)</b>	The person appointed by the Director of Human Resources in consultation with the College President, to manage a particular whistleblowing concern.
<b>Whistleblowing case Investigation Team (WIT)</b>	Individuals who have the appropriate skills and subject matter expertise to carry out the investigations in a fair and impartial manner. The team made up of 2 or 3 individuals, is selected and appointed by

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	the DHR in consultation with the College Leadership Team (CLT) for each individual case.
<b>Risk Framework</b>	A methodology for the evaluation of whistleblowing cases and the assignment of risk ratings.
<b>Legal Implications</b>	Consequences which involves being in violation of the law, acts or regulations of Singapore.
<b>Data Protection</b>	Confidentiality of College information relating to its students, parents, staff or vendors.
<b>Confidential Case report</b>	When making a Whistleblowing Case report, the individual consents to the disclosure of their identity to the Whistleblower Officer for the purposes of investigations and reporting to the relevant stakeholders.
<b>Anonymous Case Report</b>	When making a Whistleblowing Case report, the individual has not made known their identity to the Whistleblowing Case Officer.

## 5. Protocols & Practices

### 5.1 Case Reporting by Whistleblower

5.1.1 Persons who would like to consult on their potential whistleblowing concerns may speak to the Heads of Campus/ Principal/ Director.

5.1.2 A formal whistleblowing concern should be reported and followed up via the email id: [whistleblower@uwcsea.edu.sg](mailto:whistleblower@uwcsea.edu.sg) with the full set of information provided as per the Whistleblowing Report Form. This email id is managed by the Director of Human Resources (DHR).

All whistleblowing complaints are received by the DHR.

5.1.3 In case of insufficient background to the case, there will be an impact on the ability to evaluate, investigate and resolve a whistleblowing case.

5.1.4. For segregation of duties reasons, in case of a concern regarding DHR or an ARC member, the reporting email to use is: [chair@uwcsea.edu.sg](mailto:chair@uwcsea.edu.sg). This email id is managed by the Chair of the Board.

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## 5.2 Initial Case Assessment

5.2.1 All cases lodged will be evaluated by the DHR in consultation with the College Leadership Team, taking into account the severity of the possible consequences of each case in relation to the safety of the community members, legal implications, reputational damage to the College, financial loss to the College, etc. Accordingly, a risk rating would be attributed to each case. The risk rating would determine the course of action and timelines for the case.

## 5.3 Case Closure

All cases will be investigated by either the Director of Human Resources or the Whistleblowing Investigation Team, taking into account the case severity and risk rating. The College commits to closing all cases depending on the complexity within 3 to 9 months.

A detailed investigation process guidebook shall be referenced by the WIT for each case.

## 5.4 Case Reporting to ARC

5.4.1 All medium and low risk rating cases will be reported to the Audit and Risk Committee (ARC) on a quarterly basis. High risk rating cases will be notified/ reported to the ARC on an immediate basis. A quantitative report of cases, even if nil, is reported every quarter to ARC.

If the complaint was made in good faith, and subsequent investigations were not able to substantiate the claims made, no action will be taken against the whistleblower. If however, allegations were made frivolously, maliciously or for a potential personal gain, disciplinary action may follow.

5.4.2 All case reports will be treated in strict confidence. The college encourages the whistleblower to put his/her name to any concern as knowing the identity of the whistleblower may improve the effectiveness of the investigation. At the appropriate time, the whistleblower may need to come forward as a witness. It is not possible to guarantee that the whistleblower will not be named in an investigation undertaken by the College.

5.4.3 For anonymous case reports, the College will conduct investigations taking into account the seriousness of the concern raised, the credibility of the concern and the capacity to confirm the concern from attributable sources. The college may not be able to take the case further if there is insufficient information to make a risk assessment and carry out investigations on the case.

Reporting concerns to the media, will mean that the whistleblower would fall outside the protection provided by this policy.

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## 6. Templates and Processes

[Whistleblowing Report Form](#)

[Investigation Process Map](#)

## 7. Associated Policies

[Staff Safeguarding Code of Conduct](#)

[Conflict of Interest Policy](#)

[Child Safeguarding Policy](#)