

CONFIDENTIAL

INTERNATIONAL COMMUNITY SCHOOL (SINGAPORE) LTE WHISTLEBLOWING POLICY

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INTERNATIONAL COMMUNITY SCHOOL (SINGAPORE) LTD'S WHISTLEBLOWING POLICY

A. PURPOSE AND SCOPE

1. **International Community School (Singapore) Ltd (ICS)** is committed to a high standard of corporate governance, regulatory compliance, and standard of service delivery. Where there is sufficient basis to show that (a) any member of the ICS faculty & staff; or (b) any member from the ICS Board of Directors; or (c) staff involved in the delivery of and approved ICS programme in a ICS partner agency has engaged or is engaging in wrongful practices, investigation will be conducted and disciplinary proceedings may be initiated against him/her.

2. This policy applies to a member of the public ("**External Reporting Party**") or any ICS faculty & staff ("**Internal Reporting Party**"). Hence, the expression "**Reporting Party**" (wherever it appears in this document) shall refer to both External Reporting Party and Internal Reporting Party, where applicable.

3. ICS is committed to providing a safe environment for the public, all ICS faculty & staff to report wrongful practices. All reports will be treated with utmost confidence. Whilst ICS encourages each Reporting Party to identify himself/herself when making reports or providing information relating thereto, every effort will be made not to reveal the identity of the Reporting Party who makes reports or gives evidence in respect of any wrongful practice, to the extent feasible and permissible under the law. If it is an anonymous report, ICS will make its best effort to review the report to ascertain its credibility. Reports of violations or suspected violations will be kept confidential to the extent possible, in accordance with the need to conduct an adequate investigation.

4. Reporting should be made in good faith. If a report is made in good faith, but a case of wrongful practice cannot be established after investigation, no action will be taken against the Reporting Party. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary or legal action may be taken against the Reporting Party.

5. Wrongful practices that a Reporting Party can report include the mismanagement or misuse of resources, as well as inappropriate conduct and behavior which are not in line with ICS's policies. Further examples are set out below:

- a. Failure to observe a legal obligation or conduct which is an offense or breach of law;

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- b. Miscarriage of justice;
- c. Endangering the health or safety of persons or the work environment;
- d. Financial and non-financial administrative malpractice or irregularities,
- e. Unethical and improper practices or alleged wrongful conduct or fraud or deliberately including false or incorrect information in the preparation, evaluation, review or audit of financial accounts and records or in matters of financial reporting, internal controls or other related matters;
- f. Academic or professional malpractice;
- g. Inappropriate conduct or unethical behavior, which includes, but is not limited to, workplace harassment;
- h. Wilful suppression or concealment of any relevant information relating to wrongful practices;
- i. Impropriety, corruption and bribery, acts of fraud or suspected fraud;
- j. Embezzlement, misappropriation, theft or unlawful use of ICS's properties, assets or resources;
- k. Abuse and misrepresentation of power or authority;
- l. Serious conflict of interest without disclosure;
- m. Intentional provision of incorrect information to the authorities;
- n. Disclosure of confidential information to outside parties;
- o. Intimidation, discrimination or harassment of employees and external parties during the course of work;
- p. Falsification or fraudulent alteration of documents (contractual agreements, invoices, purchase orders etc.);
- q. Acts of retaliation, intimidation or harassment, discrimination or unfair treatment against staff who have made an allegation or assisted in the investigation of an allegation.

6. The above list is not intended to be exhaustive. Where in doubt, the Reporting Party can submit the details of his or her observations and concerns. This can be done via the reporting procedures detailed in Section B below.

B. REPORTING PROCEDURES

Internal Reporting Process

7. An Internal Reporting Party can report wrongful practices that he/she has observed in the Organisation to the Human Resources Director (HR Director) unless the incident involves the HR Director, in which case the Internal Reporting Party should report to his/her direct supervisor. If the Internal Reporting Party does not receive an acknowledgement from the HR Director or direct supervisor within 7 working days, the Internal Reporting Party shall thereafter be entitled to report such wrongful practices to the Head of School (HoS) or the Chief Operating Officer (COO). An Internal Reporting Party also has the option to voice any concerns anonymously through the ICS Community Voice, an internal form which can be anonymous.

External Reporting Process

8. An External Reporting Party can similarly report any activity that infringes on ICS's policies or violates the law by calling the school (6776 7435), or by emailing the school's whistleblowing email (whistleblowing@ics.edu.sg), or by using the [Compliments, Comments, and Complaints](#) link on the Parent Portal of the school's website. In all instances when a whistleblowing concern is received from an External Reporting Party via any of the above instances, the ICS staff receiving the concern shall immediately notify the Head of School.

Details to be Included in Report

9. To enable the investigation to proceed smoothly, the report by any Reporting Party should provide details such as:
- a. The parties involved;
 - b. The date and time of the incident;
 - c. A description of the incident (what happened, and specific behaviors observed that caused concern);
 - d. Evidence of the behavior observed; and
 - e. Any other information to assist with the investigation.

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10. Upon receipt of the complaint, the HR Director, the COO or the HoS will, depending on who the report is made against, forward the complaint to the relevant direct supervisor. The table below shows the decision-making party (as to whether further investigation is needed), based on whom the Report is made against.

| | If a Report is made against | | | | |
|---|---|---|---|---|---|
| | (a) Any ICS staff | (b) HoS | (c) COO | (d) Board of Directors | (e) Staff of ICS partner agency |
| Decision-making party (as to whether further investigation is needed) | Direct Supervisor | Board of Directors Chair AND Director of Global Operations, Network of International Christian Schools (NICS) | HoS AND Board of Directors Chair | HoS AND Board of Directors Chair (if the report is not against the Chair) OR Board of Directors Vice-Chair (if the report is against the Chair) | HoS |
| Follow-up | The investigation process will follow the ICS Disciplinary Framework for staff. | The investigation process will follow the NICS Disciplinary Framework for HoS. | The investigation process will follow the ICS Disciplinary Framework for staff. | The investigation process will follow the ICS Board Policy Manual. | The investigation process will follow the ICS Disciplinary Framework for staff. However, the ICS Partner Agency will be responsible for meting out the disciplinary action. |

11. The outcome of and decision made by the decision-making party (per table in para 10), will be final.

12. ICS faculty & staff should raise other Human Resource issues (e.g. promotion, performance ratings) through the existing Human Resource channels instead of the whistleblowing platforms.

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13. Any ICS faculty & staff is expected to report any wrongful practice which he/she has sufficient grounds to believe has been engaged in, even if he/she has been instructed by his supervisor not to do so. Any ICS faculty & staff who wilfully suppresses or conceals relevant information in respect of any wrongful practice may be disciplined.

14. In the case of any ICS faculty & staff who is already the subject of disciplinary, redundancy, or performance review, or other involuntary procedures, such procedures will not be terminated or suspended solely on account of his/her making a report of wrongful practice.

15. ICS does not condone wrongful practices. Where there is sufficient basis from the findings of any of those decision makers listed in paragraph 10 to show that any faculty & staff, or Board of Directors has engaged or is engaging in such practices, disciplinary proceedings may be initiated against him/her. Should it involve staff of a partner agency who is delivering the ICS programme, ICS will raise the issue to his/her employer for disciplinary action.

C. PROTECTION AGAINST REPRISALS

16. This policy is intended to safeguard any Reporting Party from discrimination resulting from making a report. Any Internal Reporting Party who has made a report of wrongful practice or given evidence as a witness in respect of the wrongful practice may submit in writing a complaint to the HoS if he/she has sufficient grounds to believe that he/she is being unfairly treated as a result of having made such a report or having given such evidence. The complaint should include details of the unfair treatment, as well as a reference to the report and/or evidence that resulted in the unfair treatment complained of.

17. ICS prohibits discrimination, retaliation, or harassment of any kind against a Reporting Party who submits a complaint or report in good faith. If he/she raises a genuine complaint pursuant to this policy, he/she will not be at risk of losing his/her job or suffering from retribution or harassment as a result. If he/she is acting in good faith, it does not matter if he/she is mistaken.

18. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline including (but not limited to) termination of employment.

Adapted from Whistle- Blowing Policy and Procedures - Singapore, Sept. 2017, [www.charities.gov.sg/PublishingImages/Resource-and-Training/Guides-Templates-Awards/Guides/Documents/Whistle Blowing Policy and Procedures IIA \(Sep 2017\).pdf](http://www.charities.gov.sg/PublishingImages/Resource-and-Training/Guides-Templates-Awards/Guides/Documents/Whistle Blowing Policy and Procedures IIA (Sep 2017).pdf).