

# WHISTLE-BLOWING POLICY

## 1) INTRODUCTION

- i. St Joseph's Institution International ("SJII"), as a company (limited by guarantee), a charity and an Institution of Public Character, is committed to a high standard of integrity and accountability in all aspects of its management and operations. SJII aims to create an environment anchored on strong Catholic-Lasallian values and where a high standard of ethics is demonstrated in all relationships amongst or between staff members, students, parents and any other persons who have dealings with SJII.
- ii. While the internal control requirements and procedures of SJII are designed to deter, prevent or detect improper actions or activities, they cannot provide an absolute safeguard against all forms of wrongdoing. Internal control requirements or procedures can be circumvented, misrepresented or overridden by staff for unethical reasons.
- iii. This Whistle Blowing Policy (the "Policy") , therefore provides an avenue for any person who has reasonable cause to believe or suspect that a wrongdoing has been, or is being, perpetrated in any aspect of SJII's management or operation to come forward and report his/her concern or complaint on a confidential basis and without fear of any adverse consequences.

## 2) SCOPE

- i. For the purpose of this Policy, a wrongdoing includes, but is not limited to, any of the following:
  - A criminal offence (e.g. fraud, criminal breach of trust, corruption, cheating, forgery, criminal misappropriation and theft);
  - Unauthorised destruction, removal or inappropriate use of SJII's records, assets or facilities;
  - Abuse or misuse of authority;
  - Discrimination on the basis of gender or race;
  - Harassment or intimidation;
  - Undeclared conflict of interests in any activity or decision made that is not, or appears not to be, in the best interest of SJII;

- Any deliberate action that is likely to endanger SJII’s employees, students and members of the public;
  - An act undertaken to mislead, deceive, manipulate, coerce or influence the preparation, examination, audit or review of any assets and records of SJII; and
  - Any other deliberate act that may cause significant reputational damage to the school.
- ii. This Policy is not to be used as a channel for taking up personal grievances. Personal grievances should continue to be taken up and resolved through the appropriate administrative channels.

### **3) REPORTING**

- i. A staff member, or anyone, who suspects a wrongdoing in SJII may write to the email address [whistleblower@sj-international.com.sg](mailto:whistleblower@sj-international.com.sg), which will be jointly managed by the Board Legal Advisor and Head of HR (or any other persons designated by the Board), providing the following information:
- The location of the alleged wrongdoing (i.e. which SJII school, which department);
  - The key person(s) involved;
  - The nature of the alleged wrongdoing;
  - The details and evidence of the alleged wrongdoing, including but not limited to date or time period over which the suspected wrongdoing has occurred, photographs, documents, statements, and/or records;
  - (Optional) The whistle-blower’s name, address (postal or email) and telephone number.

### **4) HANDLING PROCEDURE**

- i. If the whistle-blower provides his/her identity and contact details, an acknowledgement will be sent to the whistle-blower within 3 to 5 working days.
- ii. Upon receiving a whistle-blowing report, the Board Legal Advisor and/or Head of HR would make a judgement and channel the report to the appropriate member(s) of the school management or Board who shall initiate an investigation to establish the facts.
- iii. Cases of very significant wrongdoing would be referred to the Board Chairman, who may appoint an Inquiry Committee chaired by a Board member with other members being either board members or other independent persons with no conflict of interests. The terms of reference of the committee would be to establish the validity of the complaint and to recommend follow up actions (of a corrective, remedial, preventive, or regulatory enforcement nature).

- iv. In the case of an anonymous report, the complaint will be addressed taking into account the seriousness of the issues or matters raised, credibility of the complaint as may be determined from an analysis of the substance and tone of the report and any corroborative evidence presented. Having considered all information and evidence provided, the school management or Board may choose not to pursue the matter further if there is insufficient information available or where it is felt or determined that there is no merit to the complaint. Therefore, to help ensure that investigations are effective, whistle-blowers are encouraged to furnish clear evidence, or substantiating records or documents, or to identify themselves and provide their contact details so that clarifications can be sought, and/or verbal evidence considered.

**5) SUSPECTED CRIMINAL WRONGDOING**

- i. SJII reserves the right to and may refer any concern arising from a whistle-blower report to the appropriate law enforcement agency at any time during the processing of the report, if a criminal wrongdoing is suspected to have occurred.

**6) REPORT MADE IN GOOD FAITH**

- i. If a whistle-blower reports a concern under this Policy and the investigations subsequently show that it is untrue or false, the whistle-blower will be protected from any form of reprisal provided that the report was made in all good faith and not motivated by a desire for personal gain, malice, or rancour.
- ii. If a whistle-blower is found to have made a report maliciously, that is intentionally false or untrue, or for personal gain, the School reserves the right to take disciplinary action against the whistle-blower.

**7) CONFIDENTIALITY**

- i. Every effort will be made to keep the identity of whistle blowers confidential. However, the identity of a whistle-blower may be disclosed in appropriate circumstances such as where the identity is required to be revealed by law, where the whistle-blower has waived his or her right to confidentiality, where the identity has to be disclosed on a strictly confidential basis for the purpose of obtaining professional advice, or where in the opinion of a majority of the Board of Governors, it would be in the best interests of the School to reveal the identity of the whistle-blower.