

1. POLICY STATEMENT

The College has a values-based culture which encourages openness, integrity and accountability. Accordingly, the College is committed to maintaining an environment which encourages responsible and secure reporting of actual or suspected wrongdoings without fear of reprisal when whistleblowing in good faith.

2. POLICY RATIONALE

The purpose of this policy is to provide clarity about the established process used by the College to report actual or suspected wrongdoings.

3. POLICY SCOPE

3.1 Eligibility

The following individuals (current or in a former capacity) may report a wrongdoing under this policy:

- A. Staff members - includes all Full time, Part time, or contract staff.
- B. College students - includes existing or former students.
- C. Parents of College students - includes existing or former students.
- D. Allied staff - includes individuals who are not staff members and are associated with the College for the purpose of providing goods or services either directly or indirectly (eg. Independent External Contractors, Shadow Teachers, Volunteers, and Interns).
- E. Vendors - includes external individuals or third party organisations that provide goods or services to the College, either paid or unpaid (eg. volunteers).

3.2 Types of Wrongdoing

Although not exhaustive, the types of wrongdoing which are covered by this policy include:

- A. Breach of UWCSEA's Code of Conduct;
- B. Practices or behaviours of concern relating to honesty or integrity or misrepresentation, including fraud, theft, bribery and corruption, dissimulation of a fraud;
- C. Conflict of interest, including those relating to outside business interests, relationships, improper assessment, payments and donations;

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- D. Practices or behaviours of concern relating to compliance with policies, procedures or the law; breaches of privacy or confidentiality, including student information;
- E. Unethical behaviour that does not represent the College's commitment to do the right thing by its community members; abuse of power;
- F. Health and Safety or environmental dangers or damage

3.3 Exclusions

The following types of wrongdoing are generally not covered by this policy:

A. Parent Concerns on student-related matters

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

B. Individual work-related matters

Existing College staff members should refer to the Grievance Policy to report a matter that directly affects their employment, and ex-College staff members should channel their enquiry to the Chief Human Resources Officer (CHRO).

3.4 Ownership

The Board's Audit and Risk Committee (ARC) has oversight of this policy. The CHRO has the operational responsibility required to execute this policy, including the receipt, investigation, review and resolution of reported cases.

4. DEFINITIONS

Whistleblower	An individual who reports a wrongdoing
Wrongdoing	Any activity which is potentially illegal or immoral and is likely to bring the College into disrepute
Whistleblowing Investigation Team (WIT)	The team appointed by the CHRO or by the Chair of the Board of Governors to investigate a whistleblowing case
Risk Framework	A methodology for the evaluation of whistleblowing cases and the assignment of risk ratings
Legal Implications	Consequences which involve being in violation of the law, acts or regulations of Singapore

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Data Protection	Confidentiality of College information relating to its students, parents, staff or vendors.
Whistleblowing Report Form	Used by the Whistleblower to report an actual or suspected wrongdoing
Confidential Case Report	The Whistleblower has provided consent to disclose their identity to the WIT for the purposes of investigations and reporting to the relevant stakeholders
Anonymous Case Report	The Whistleblower has not provided consent to disclose their identity to the WIT for the purposes of investigations and reporting to the relevant stakeholders

5. PROTOCOLS AND PRACTICES

5.1 Case Reporting

5.1.1 A formal Whistleblowing Report Form should be completed and emailed to whistleblower@uwcsea.edu.sg. This email account is managed by the Chief Human Resources Officer (CHRO).

5.1.2 Should the alleged wrongdoing involve the CHRO, Head of College, or an ARC member, the completed Whistleblowing Report Form should be emailed to chair@uwcsea.edu.sg. This email account is managed by the Chair of the Board of Governors.

5.1.3 It should be noted that there will be an impact on the ability to reasonably evaluate, investigate and resolve a whistleblowing case if insufficient detail is provided in the submitted Whistleblowing Report Form.

5.2 Case Assessment

Each submitted Whistleblowing Report Form will be evaluated by the applicable College representative to determine the severity of possible consequences (eg. safety of College community members, legal implications, data protection issues, reputational damage to the College, and financial loss to the College). A risk rating of High, Medium or Low will then be attributed to that case as well as a case number.

5.3 Case Investigation

Cases will be investigated in accordance with detailed guidelines by the appointed Whistleblowing Investigation Team.

5.4 Case Resolution

The CHRO will determine what steps are to be taken. Depending on the investigation findings, formal disciplinary action may be taken. For the avoidance of doubt, there is no appeal process with regards to the investigation findings however the College may consider new evidence on a case-by-case basis. Although the CHRO is responsible for case closure, the College commits to closing all cases within three (3) months (for High Risk) to nine (9) months (for Low Risk).

5.5 Case Reporting to ARC

All Medium and Low Risk rated cases will be reported to the ARC on a quarterly basis. All High Risk rated cases will be reported to the ARC on an immediate basis. A quantitative report of cases, even if zero (0), will be reported to the ARC every quarter.

5.6 Other considerations

5.6.1 If a claim of wrongdoing was made in good faith, the College will ensure that the whistleblower is protected from retaliation regardless of whether or not the claim could be substantiated via the investigation process. If a claim of wrongdoing was made frivolously, maliciously, or for potential personal gain, disciplinary action may follow.

5.6.2 As all cases will be treated in strict confidence, the College encourages the whistleblower to put their name to any claim of wrongdoing 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.

5.6.3 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 subsequent investigations.

5.6.4 Reporting claims of wrongdoing via any form of the media shall void any protections provided to a whistleblower by this policy.

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

5.6.6 An alleged wrongdoing may also be reported to an external agency such as the Office of the Commissioner of Charities.

6. ASSOCIATED POLICIES AND REFERENCES

- [Staff Code of Conduct](#)
- [Conflict of Interest Policy](#)
- [Child Safeguarding Policy](#)
- [Staff Safeguarding Code of Conduct](#)
- [Grievance Policy](#)
- [Disciplinary and Appeals Policy and Procedure](#)
- [Whistleblowing Report Form](#)
- [Whistleblowing Investigation Team Guidelines](#)