UWC Thailand Whistle-Blowing Procedures (4.7)

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1. General Principles

1.1 The UWC Thailand Whistleblower policy (the "**Policy**") supports a safe and inclusive culture and allows issues to be addressed in an appropriate manner. In accordance with our codes of conduct and expectations of behaviour. UWC Thailand expects all parties within our community to abide by all applicable school policies, legal requirements and any overriding moral and ethical expectations placed upon such parties and their actions. UWC Thailand will not tolerate any action or omission of action that is unlawful, immoral, or unethical. Any report of a breach of these principles will be investigated and if found correct, pursued.

1.2 UWC Thailand expects all such parties to be able to make appropriate judgement as to whether any prospective action or omission of action may be unlawful, immoral, or unethical, and if there is any uncertainty UWC Thailand expects such parties to consult the appropriate body or person within the UWC Thailand structure should there be any doubt.

1.3 These procedures are meant to accommodate anonymous reporting and cover only reports of perceived **unlawful, immoral, and unethical actions and omission of actions** by any party within our community which would constitute a violation of public interest. There may be other Policies that at times overlap with these procedures, such as the Head of School regarding Board Member Misconduct, Employee Misconduct, Safeguarding, Harassment, or Community Grievances. Please review these other Policies to ensure that the correct means / channel of communication is followed for a specific concern. These policies can be found on the School's Portal. You may contact communications@uwcthailand.ac.th or boardsecretary@uwcthailand.ac.th if you can not locate any policy and the School will provide the link or file to you. If still unsure, use the procedures outlined herein to disclose your concerns. You do not have to be personally impacted by concerns about such unlawful, immoral, or unethical action or omission of action to raise the concern.

1.4 A concern may be reported under your own name, but in such case the report must indicate that you are willing to come forward for further investigation, and to what extent. The Policy unconditionally respects each whistle-blower's decision regarding the extent to which they wish to be personally involved in the process.

1.5 As the Whistle-Blowing Policy is designed to address serious circumstances and events and its procedures and resources should not be unnecessarily overwhelmed, when possible, you should review other policies and channels of communication at the School prior to disclosing information via this Policy, to ascertain if there is any mechanism under another policy that is more appropriate. Minor disputes and issues related to performance management should be resolved between the involved parties. You should, in any case, specifically review the Community Grievances Policy to see whether the issue you plan to report under this Policy can be properly addressed under the Disputes, Complaints and Grievances Procedures.

The following issues or actions are examples of items that would fall under the Whistle-Blowing Policy:

- Legal Compliance and Criminal Activity
    - Breaking the law: Non-compliance with Thai laws, including non-employment contractual obligations, health and safety regulations, and procurement policies.
    - Criminal or civil offences: Any action that constitutes a violation of criminal or civil law in Thailand.
    - Failure to protect personal information and/or data under Thai law: Breaches of data privacy laws and regulations.
    - Examples:
        - Theft: Unauthorised taking of property belonging to the School, colleagues, students, or other stakeholders.
        - Document Falsification: Altering, forging, or creating false records, including academic, financial, or employment documents.
        - Financial Misconduct: Engaging in fraudulent activities such as misappropriation of funds, unauthorised financial transactions, or deliberate misrepresentation of financial records.

- Health, Safety, and Well-being
    - Threats to an individual's health and safety: Situations that endanger the physical or mental well-being of students, staff, or visitors.
    - Failure to properly rectify a serious issue: Inaction or insufficient action taken after a serious health or safety concern has been identified and communicated.

- Environmental Protection
    - Potential or actual damage to the environment: Activities that harm the environment, including failure to adhere to the school's sustainability policies or Thai environmental regulations.

- Integrity and Ethical Conduct
    - Damage to reputation: Actions that compromise the school's standing in the community, locally or internationally.
    - Cover-ups: The belief that someone is deliberately concealing misconduct, negligence, or other breaches listed in this policy.
    - Conflict of Interest: Participating in activities or relationships that conflict with the best interests of the School or compromise impartiality.

- Accountability and Governance
    - Failure to act on identified issues: Neglecting to address serious problems or concerns after being made aware of them.
    - Breach of governance policies: Violations of internal policies, such as those related to ethical leadership, decision-making, or oversight.

1.6 These procedures are designed to be used for actual misconduct and should not be used to disseminate or further any agenda with regard to policy discussion or disagreement, slander any party, or address any baseless rumours. Please be a good judge when the issue is based on rumour: claims cannot be progressed without evidence, and its absence will mean an investigation cannot proceed.

1.7 No party shall be retaliated in any manner for having reported a valid concern under these procedures. However, any intentional slander will not be tolerated and will be reported to the Chair of the School Board.

2. Whistle-Blowing and Response Procedures; Principles of Investigation

If you would like to report any issue, please send an anonymous or non-anonymous email to the following email address: pranat@dvsling.com (Mr. Pranat Laohapairoj).

Note that if you choose to do this anonymously, please ensure that you create a new email address which does not provide the means to identify you.

The recipient of such email ("**Initial Investigator**") is impartial. This is to ensure that there is impartial judgement and that nobody within the governance structure of UWC Thailand is unjustly shielded against any valid whistle-blowing issue. The Initial Investigator will be fluent in Thai and English.

The steps below outline the procedures from start to finish.

Step 1	The whistle-blower sends an email to the above address, anonymous or non-anonymous. The Initial Investigator sends an acknowledgement email to signify that the issue has been properly received by the system.

Step 2	The Initial Investigator will review the material presented; and whether it falls under these procedures. The Initial Investigator may contact the whistle-blower to gather more information. The identity of the whistle-blower will be kept strictly confidential by the Initial Investigator regardless of how the case proceeds forward. If the Initial Investigator determines that the matter is baseless or does not fall under these procedures, the Initial Investigator will notify the whistle-blower of such determination and will provide a simple, non-factual, non-identifying summary to Head of School (except for the case that the Head of School is partial to the issue, in which case to the Chair of the School Board) that a whistle-blower complaint has been filed, investigated, and determined to be baseless or irrelevant.

Step 3	If the Initial Investigator determines that further investigation is warranted for said issue, the Initial Investigator will send the gathered facts (without identity of the whistle-blower, except if the whistle-blower explicitly allows so) to the relevant investigating body, as follows: • If an issue regarding the School Board as a whole or the Chair of the School Board, to ESF Board. • If an issue regarding not more than two Members of the School Board, including Head of School, to the Chair of the School Board. • If an issue regarding any teacher, to the Head of School. • If an issue regarding any non-teaching employee, to the Director of Human Resources. • If an issue regarding any outsource employee, vendor or other non-school entity, to the Head of School. • If an issue regarding any student, to the Designated Safeguarding Lead. • If it is an issue regarding boarding, to the Director of Residential Life. • If an issue regarding any parent or guardian, to the Head of School.

Step 4	The receiver of the summary of facts as structured above shall take a necessary action to address the issue, using the following rules and principles: ● The person / body shall form an ad hoc group of 3 impartial individuals (the "**Task Force**"), including him/her/themself, to investigate the issue, including review of documents, interview of individuals, and other types of investigation. ● The Task Force shall work on the basis of majority-decision principle, including timing and speed of investigation, whether to investigate quietly or direct questions against the accused, whether to drop or continue investigation, or whether to afford more opportunities to the accused individual or company to provide additional facts, and ultimately how to conclude the matter. The Task Force may provide updates to the parties involved as it deems necessary. ● The accused party may choose to have assistance for his/her/their/its correspondence with the Task Force, including in a form of legal counsel, but in such case must notify the Task Force at least seven (7) days in advance if possible, and the Task Force may in its absolute discretion choose to postpone the upcoming meeting or interview as it deems appropriate, and may choose to involve its own assistance, with approval of the Head of School, except for the case that the Head of School is party to the issue, in which case the approval will come from the School Board. ● The accused and the whistle-blower (if chosen to self-identify) will not be set for any confrontation. All investigations will be done separately. ● Minutes of meetings and interviews will not be shared with any party being involved in the issue, except if the Task Force deems appropriate. ● In any case and regardless of the methods of investigation, the Task Force will abide by the principles of innocence until proven guilty, absolute confidentiality, and impartiality. Any conflict of interest shall be declared and avoided by way of recusing. The review of the case will be done factually and holistically. ● The conclusion of the matter, whatever it may be, shall be sent to the Head of School (except for the case that the Head of School is party to the issue, in which case to the Chair of the School Board) in

	a form of a formal report with recommendation, for final execution of action by the Head of School (except for the case that the Head of School is party to the issue, in which case by the Chair of the School Board), if necessary and as deemed appropriate. The Task Force may choose to provide updates to the whistle-blower as deemed appropriate. • The Head of School (except for the case that the Head of School is partial to the issue, in which case the School Board) may at any moment or stage involve outside legal counsel or refer the issue to outside parties, including legal counsel or state authority.

3. Contact details & other resources

Published on:
https://www.uwcthailand.ac.th/uwc-thailands-whistleblower-procedures

Staff may also access the procedures through the:
UWC Staff Ecosystem