



Whistle-blowing Policy

1. OVERVIEW.....	2
2. GUIDING PRINCIPLES	2
3. OBJECTIVES OF THIS POLICY.....	2
4. DEFINITION OF WHISTLE-BLOWING.....	2
5. PROTECTION FROM REPRISAL OR VICTIMISATION.....	3
6. CONFIDENTIALITY	3
7. UNTRUE ALLEGATIONS	3
8. THE RESPONSIBLE OFFICER	3
9. MAKING A REPORT	4
10. RESPONSE FROM THE SCHOOL.....	4
11. REVIEW/APPEAL.....	4

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
DOHR	Talent Committee 16 Nov 2023	Nov 2023	DOP	Nov 2026

1 Overview

- 1.1 A decision to blow the whistle should only be taken in cases of extremely serious matters. This policy provides members of our community an avenue within the School to raise serious concerns.
- 1.2 This policy applies to all employees, students, officers, governors, consultants, contractors, volunteers, work placement students, interns, casual workers, agency workers, parents and visitors to the School.
- 1.3 It does not preclude nor absolve the whistle-blower from reporting the matter to the police/authorities where they wish to do so or where such a duty to report exists at law.

2 Guiding Principles

- 2.1 The whistle-blowing procedure enables anyone to express a legitimate concern regarding suspected malpractice within the School. It is separate from the School's procedures regarding grievances and complaints.
- 2.2 This policy guides the whistle-blower on how to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of students.
- 2.3 Concerns about safeguarding and child protection should, in the first instance, be managed under the Safeguarding and Child Protection Policy.
- 2.4 The whistle-blowing procedure should not be used to raise grievances about personal circumstances in the workplace.

3 Objectives of this Policy

- 3.1 To encourage members of our community to feel confident in raising serious concerns and to question and act upon concerns about practice.
- 3.2 To provide avenues for members of our community to raise those concerns and receive feedback on any action taken.
- 3.3 To ensure that any individual who raises a concern receives a response and that they are aware of how to pursue their concerns if they are not satisfied with the outcome.
- 3.4 To reassure members of our community that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made their disclosure in good faith.

4 Definition of Whistle-blowing

- 4.1 Whistle-blowing is defined as raising a concern about a wrongdoing within an organisation.
- 4.2 The whistle-blowing policy is intended to cover major concerns or where there is a belief that procedures have not been appropriately adhered to. These include:
 - Conduct which is an offence or a breach of the law
 - Disclosures related to miscarriages of justice
 - Health and safety risks, including risks to the public as well as other employees

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
DOHR	Talent Committee 16 Nov 2023	Nov 2023	DOP	Nov 2026

- Damage to the environment
- The unauthorised use of School funds
- Possible fraud and corruption
- Sexual or physical abuse of individuals
- Other unethical conduct

5 Protection from Reprisal or Victimisation

- 5.1 We recognise that the decision to report a concern can be a difficult one and we make every effort to support the individual making the disclosure through the process.
- 5.2 We will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect employees and other individuals when they raise a concern in good faith.
- 5.3 If an individual making a disclosure feels they are being harassed or victimised, they should report this immediately to the Director of People, who will investigate whether action needs to be taken against the perpetrators of the harassment / victimisation allegations.
- 5.4 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary procedures already in progress against the individual making the disclosure.

6 Confidentiality

- 6.1 Anyone wishing to raise a concern under this procedure is entitled to have the matter treated confidentially as far as it is possible to do so. We will make every effort to keep the reporter's identity confidential. If it is necessary for the investigator to know the individual's identity, the need for disclosure will be discussed with the individual in advance.
- 6.2 Individuals must express their concern in writing rather than verbally or anonymously so that we can establish that the allegations are credible. Proper investigation may be more difficult or impossible if we cannot obtain further information from the reporting individual when needed. Individuals worried about possible reprisals if their identity is revealed should make their concerns known when making their disclosure.
- 6.3 If there is evidence of criminal activity, the Police may be informed.

7 Untrue Allegations

- 7.1 If an individual makes an allegation in good faith, but it is not upheld following an investigation, no action will be taken against them.
- 7.2 If an individual makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

8 The Responsible Officer

- 8.1 The Director of People has overall responsibility for the maintenance and operation of this policy. The Director of People maintains a record, of all concerns raised and records the outcome in a manner that does not compromise the reporting individual's confidentiality. The

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
DOHR	Talent Committee 16 Nov 2023	Nov 2023	DOP	Nov 2026

Director of People will report to the CEO, who will in turn report as necessary to the Board of Governors.

9 Making a Report

- 9.1 Whistle-blowing concerns should always be made in writing and should not be anonymous.
- 9.2 Whistle-blowing concerns may be reported through the following routes:
- Directly to the Director of People
 - Directly to the Chief Executive Officer
 - Via email to TTSWhistleblower@tts.edu.sg
 - Via the Whistleblowing link on the Staff and Parent Portals
- 9.3 Visitors or other individuals should report their suspicions to the Director of People, the relevant Head of School or to the Chief Executive Officer.

10 Response from the School

- 10.1 The School will respond to concerns raised in accordance with the [school's Internal Investigation Protocol](#).
- 10.2 Where any meeting is arranged, off-site if preferred, the individual can be accompanied by a union or professional association representative or a friend.
- 10.3 We will take steps to minimise any difficulties the individual may experience as a result of raising a concern. If they are required to give evidence in criminal or disciplinary proceedings, we will arrange for them to receive advice about the procedure.
- 10.4 The reporting individual will understandably want to know that the matter has been properly addressed so, subject to legal constraints, we will advise them of the outcome of any investigation.

11 Review/Appeal

- 11.1 If the reporting individual is not satisfied with the action taken, they can raise the matter directly with the Chair of the Board of Governors through the Formal and Independent Review / Appeal Request process.
- 11.2 If the reporting individual is still not satisfied with the action taken after the Formal and Independent Review / Appeal, they may raise the matter directly with the Committee for Private Education (CPE).

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
DOHR	Talent Committee 16 Nov 2023	Nov 2023	DOP	Nov 2026