

<b>Policy Code</b>	<b>GM/1.2</b>
<b>Policy Category</b>	<b>Grievance and Mediation</b>
<b>Policy Title</b>	<b>Whistle Blowing Policy</b>
<b>Revision/Effective Date</b>	<b>February 2016</b>

### **Introduction**

Employees are often the first to realise that there may be something seriously wrong within the school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

Tanglin Trust School is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees, and others that we deal with, who have serious concerns about any aspect of the school's work, to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy makes it clear that all members of our community can do so without fear of victimisation, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within the School rather than overlooking a problem or 'blowing the whistle' outside.

The policy applies to all employees, suppliers and those contractors working for the School on School premises, for example, catering staff, bus staff, builders and contractors, etc., as well as parents and visitors to the School.

These procedures are in addition to the school's complaints procedures.

### **Aims and Scope of Whistle-blowing Policy**

This policy aims to:

- Encourage members of our community to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues for members of our community to raise those concerns and receive feedback on any action taken;
- Ensure that any individual who raises a concern receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied;
- 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 any disclosure in good faith.

There are existing procedures in place to enable staff to lodge a grievance relating to their employment. The whistle-blowing policy is intended to cover major concerns that fall outside the scope of other procedures. 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;
- Damage to the environment;
- The unauthorised use of school funds;
- Possible fraud and corruption;
- Sexual or physical abuse of individuals with no affiliation to the school, or;
- Other unethical conduct.

Thus, any serious concerns that a staff member has about any aspect of service provision or the conduct of other employees of Tanglin Trust School or others acting on behalf of Tanglin Trust School can be reported under the whistle-blowing policy. This may be something that:

- Makes an individual feel uncomfortable in terms of known standards, their experience or the standards they believe the School subscribes to; or
- Is against the school's policies and procedures; or
- Falls below established standards of practice; or
- Amounts to improper conduct.

This policy does **not** replace the school's complaints procedure.

## **Safeguards**

### Harassment or Victimisation

Tanglin Trust School is committed to good practice and high standards and wants to be supportive of employees.

The school recognises that the decision to report a concern can be a difficult one to make. Employees making a disclosure should have nothing to fear as they will be doing their duty to the school and those for whom they are providing a service.

Tanglin Trust School will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect employees and other members of our community when they raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary procedures that already affect the employee making the disclosure.

## **Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. At the appropriate time, however, the individual may need to come forward as a witness.

## **Anonymous Allegations**

This policy encourages individuals to put their name to the allegation whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the school.

In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

## **Untrue Allegations**

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an individual makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

## **How to raise a Concern**

- Where possible, suspicions should be reported to the Director of Human Resources or the Assistant Director of Human in the first instance.
- If staff feel uncomfortable reporting their suspicions to HR, they may raise this issue with the Chief Executive Officer.
- If staff feel uncomfortable reporting their suspicions to either of the above options, they may then contact the Chair of the Staff Sub Committee through the Company Secretary at [cosec@tts.edu.sg](mailto:cosec@tts.edu.sg) to register the concern.
- In the case of parents or visitors where there is no line manager, suspicions should be reported to the relevant Head of School or to the Chief Executive Officer.
- The Chair of the Staff Sub Committee plus one other Governor (normally the Chair of the Sub Committee for the area of the raised concern e.g. if a Finance problem, the Chair of the Finance and Audit Sub Committee) will convene a confidential hearing of the facts and evidence surrounding the concern and take appropriate legal advice.
- This Governor panel will conduct any necessary enquiries to investigate the concern and make recommendations for action to the Chair of Governors &/or the Chief Executive Officer as appropriate.
- If the concern involves the Chair of the Staff Sub Committee an individual may raise that concern in the first instance to the Chair of the Board of Governors.

Concerns may be raised verbally or in writing. Individuals wishing to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates);
- The reason for the concern about the situation.

The earlier the concern is expressed, the easier it is to take action.

Although an individual is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern.

### **How the School will respond**

The school will respond to concerns raised. Where appropriate, the matters raised may:

- Be investigated by management, internal audit or through the disciplinary process;
- Be referred to the police;
- Be referred to an external auditor;
- Form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the school will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

- As soon as is reasonably possible, the responsible person will write to the individual:
  - Acknowledging that the concern has been received;
  - Indicating how the school proposes to deal with the matter;
  - Giving an estimate of how long it will take to provide a final response;
  - Telling the individual whether any initial enquiries have been made
  - Supplying the individual with information on staff support mechanisms; and
  - Telling the individual whether further investigations will take place and if not, why not.

The amount of contact between the officers considering the issues and the individual who has raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the school will seek further information from the individual.

Where any meeting is arranged, off-site if preferred, the individual can be accompanied by a union or professional association representative or a friend.

The school will take steps to minimise any difficulties which the individual may experience as a result of raising a concern. If required to give evidence in criminal or disciplinary proceedings the school will arrange for the individual to receive advice about the procedure.

The school accepts that the individual will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the school will inform the individual of the outcome of any investigation.

### **The Responsible Officer**

The Chair of the Staff Sub-Committee has overall responsibility for the maintenance and operation of this policy. That officer maintains a record of all concerns raised and the outcome, in a form that does not endanger an individual's confidentiality, and will report as necessary to the Board of Governors.

### **How The Matter Can Be Taken Further**

This policy is intended to provide members of the Tanglin community with an avenue within the school to raise concerns. The school hopes that individuals will be satisfied with any action taken. If not, it is possible to take the matter directly to the Chair of the Board of Governors.

**Please note that the Whistle-blowing route should only be followed for extremely serious matters.**