

Policy	Whistleblowing Policy				
Approval Date:	January 2023		Next review:	January 2025	
Review Cycle:	24 months				
Scope	Whole Group		Whole School		✓
	International Primary		National Primary		
	International Secondary		National Secondary		
Ownership:	Campus Principal		Approved by:	ISP Regional	

TENBY SCHOOLS SETIA ECO GARDENS

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Introduction

ISP and The Campus Principal are committed to delivering high-quality education service to pupils and expect high standards from their staff and contractors. In order to maintain these high standards, a culture of openness and accountability is vitally important.

The aims of this policy are:

- to encourage staff to raise concerns about malpractice within the School without fear of reprisal
- to reassure staff that concerns will be taken seriously
- to provide information about how to raise concerns and
- explain how the concerns raised will be addressed.

Parties who can raise a concern

This policy applies to all School staff (full-time or contract staff), agency staff, contractors and volunteers engaged by the School. There is a separate procedure for pupils and parents to raise concerns about school-related issues.

Definition of whistleblowing

In practical terms, whistleblowing occurs when a concern is raised about a danger, illegality or unethical conduct **that affects others**. As the person raising the concern, you will not necessarily be directly affected by the danger or illegality. Consequently, you will not necessarily have a personal interest in the outcome of any investigation into your concerns.

Whistleblowing is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated. This poor treatment could involve a breach of your individual employment rights or bullying and you are entitled to seek redress for yourself.

Raising concerns on Malpractice

Malpractice covers a wide range of concerns. The types of activity that should be disclosed include but are not limited to the following:

- the physical, emotional or sexual abuse of pupils or staff
- unauthorised use of School funds and/or financial maladministration
- fraud and corruption
- failure to comply with legal obligations
- endangering an individual's health and safety
- damage to the environment
- a criminal offence
- failure to follow financial and contract procedure rules
- showing undue favour to a contractor or a job applicant
- miscarriages of justice
- deliberate concealment of information relating to any of the above
- concerns about the professional practice or competence of colleagues, other members of staff or other workers
- · conflict of interest

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Raising Concern(s)

Concerns should be raised with the Campus Principal. The earlier a concern is raised the easier it will be to take action. You the whistleblower are a witness to events, not the investigator. You do not need to wait for compelling evidence of malpractice before raising concerns, but you must have reasonable grounds for your suspicion.

When reporting a concern you should provide as much information and detail as possible. You should provide the following to help the investigator to focus on the main issues quickly:

- the full names of the people involved or who know about what is happening,
- · dates of events and
- any relevant supporting evidence or documentation.

There will be some cases where it is not appropriate for you to raise concerns with your Campus Principal, for example where you suspect your Campus Principal already knows about the malpractice or where you suspect your Campus Principal may be involved. In those cases, you should report your concerns to the Regional Managing Director.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. You will be advised whether an investigation takes place or not.

Advice and Support

Whistleblowers who consider that they have been victimised as a result of whistleblowing should make a formal complaint to the Campus Principal or the school's Human Resources Department immediately giving details of the way in which they believe they have been subject to the detriment and their reasons for thinking that the detriment might relate to their disclosure. The complaint is to be escalated to the Regional Managing Director if it is deemed not appropriate to be raised with the Campus Principal or the school's Human Resource Department.

ISP is committed to protecting the whistleblower from all acts of harassment, retaliation, victimisation and recrimination arising from making the disclosure in good faith.

Confidentiality

The School understands that you may be reluctant to come forward with information about the wrongdoing of a colleague or manager or indeed at all. As such, the School recognises that whistleblowers may wish to raise concerns in confidence. If you (the whistleblower) make a request for the matter to be kept confidential then your identity will not be revealed without discussing the matter with you first.

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Anonymous Allegations

It is recognised that the purpose of a whistleblowing policy is to allow people to make protected disclosure with the protection being against any reprisals or victimisation for disclosures made honestly and in good faith. It is very difficult for some people to come forward and make a disclosure and the prospect of having to identify yourself can make the action of whistleblowing even more daunting. You are encouraged to give your name when raising concerns.

A concern expressed anonymously is much less powerful and is often more difficult to investigate and can lack credibility. The decision on whether to investigate an anonymous allegation will be made by the Campus Principal or the Regional Managing Director (depending on who handles the complaint). When making this decision, the seriousness of the issues raised, the credibility of what is being said and the likelihood of confirming the allegation from other sources will be considered.

Protection for the Whistleblower

All concerns raised under this procedure will be treated seriously and a decision made about whether an investigation is appropriate. Depending upon the nature of the matter it may be further referred to the external auditor or the police.

The person to whom you reported your concern will be responsible for keeping you informed about the progress of the investigation and the action, which has been taken, although you may not be told the outcome. In some cases, the investigation may result in criminal or disciplinary proceedings. If this happens you may be invited to give a written statement or give evidence at a hearing. The Campus Principal or Head of Human Resources, Malaysia at the regional office will support you in this process and ensure that you are clear about what will happen.

Allegations not made in the public interest

The school will not tolerate abuse of this Policy. Concerns that are raised frivolously, maliciously, or where they are known to be untrue may result in disciplinary action or, in the case of agency staff, the termination of the agency contract. In the case of contractors, the matter will be reported to the relevant Manager in charge of the contract so that a decision can be made about the appropriate action to take.

Reviews and Operation of this Policy

ISP in partnership with the regional office and school has overall responsibility for the operation of this policy.

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