



THE ALICE SMITH SCHOOL

Whistle Blowing Policy

Implementation Guidelines

Introduction

This Policy is designed to support ASSA's commitment to develop and maintain a high standard of professional practice and integrity as a not for profit educational institution.

Guiding Principles

Through this whistle blowing policy, the school:

- Establishes the rules and safe and effective procedures for any stakeholder of ASSA to, upon discovery of possible improper, fraudulent or corrupt conduct, illegal acts or malpractices, disclose or report a genuine concern or allegation to the Chair of the Council of Governors or the Chair of the Finance Subcommittee
- Provides the avenue to alert the Chair of the Council of Governors or the Chair of the Finance Subcommittee of ASSA to the fact that its reputation or the interests of its stakeholders are being wrongfully harmed, or that they are at risk of harm
- Safeguards the individual who makes the allegation or reports the misconduct (the "whistle-blower")

Protection

This Policy is designed to offer protection to those who made an allegation, provided the allegation is made in good faith. The whistle-blower shall not suffer any detrimental treatment as a result of raising a genuine concern in good faith. ASSA, however, does not extend this assurance to an individual who maliciously raises a matter he/she knows is untrue. If an individual makes malicious allegations, disciplinary action may be taken against the individual.

Reporting under this Policy in no way immunizes or shields a whistle-blower against action following from his or her intentional misconduct, which includes wilfully making allegations through the whistle-blowing mechanism that the individual knows to be false or makes with an intent to misinform. Whistle-blowing is not an acceptable reason for complicity in misconduct.

Procedures: Initiation of an Allegation

Any stakeholder is encouraged to raise genuine concerns about impropriety at the earliest opportunity, and in an appropriate way.

As a first action, a whistle-blower should raise concerns using the method below:

- A report should be raised with the Chair of the Council of Governors or the Chair of the Finance Subcommittee who must undertake to treat all allegations in a confidential and sensitive manner.
- The Chair of the Council of Governors or the Chair of the Finance Subcommittee:
 - ❑ Has the responsibility to ensure that concerns raised are taken seriously
 - ❑ Where appropriate, should investigate properly and make an objective assessment of the concern
 - ❑ Has the responsibility to ensure that the action necessary to resolve a concern is taken
 - ❑ Must keep the stakeholder advised of progress.

Making an Allegation

This policy does not deal with concerns, grievances or complaints. Separate policies are in place for dealing with any concerns or complaints that parents may have with respect to educational matters and day to day operations of the school. Likewise, there are policies and procedures for settling disputes and grievances that may occur with staff.

Concerns that a stakeholder of ASSA wishes to raise at this level (for example, involving impropriety or illegality) must be raised in writing by email to the Chair of the Council of Governors (CoG_Chair@alice-smith.edu.my) or the Chair of the Finance Subcommittee of ASSA (FSC_Chair@alice-smith.edu.my). The following information must be available:

- Background of the individual initiating the allegation
- Date(s), details and reasons why the individual is concerned about the conduct

Where relevant, the individual may be requested to submit evidence and documentation. Any meetings arranged will be conducted discreetly and if necessary, off-site of the school campuses.

The individual may independently engage professional advice or guidance on how to pursue the matter before coming forth. The individual may have a colleague, a friend or a legal adviser present during any meetings or interview.

Investigation and Follow-up

The Chair of the Council of Governors or the Chair of the Finance Subcommittee is committed to investigate and address all cases of reported misconduct and shall:

- Receive and filter complaints
- Determine actions to be taken
- Assign investigations
- Ensure closures and conclusions

- Report to the Council of Governors

In order to protect individuals and those accused of misconduct, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The concern raised may:

- Require immediate remedial action before the investigation is conducted or concluded
- Be investigated internally by management, internal audit and independent inquiry or through a disciplinary process
- Be referred to the Council of Governors for further action
- Be referred to law enforcement for criminal investigation.

Based on the level of severity, the Chair of the Council of Governors or the Chair of the Finance Subcommittee shall determine the channel for investigation and follow-up action.

The whistle-blower may seek follow-up information about an investigation of a report or any consequent action taken. Subject to legal limitation, the whistle-blower will be kept informed of the final outcome of the investigation.

Confidentiality

ASSA wishes to assure the safety and confidentiality of the whistle-blower, and therefore undertakes to treat all allegations in a confidential and sensitive manner. A report of the allegation will only be disclosed to those individuals who have a need to know in order to properly carry out an investigation of the allegation.

All concerns raised will be treated fairly, properly and confidentially.

Evaluation of the Policy

The Council of Governors will update and amend this policy as and when required to ensure that the policy is up-to-date and effectively implemented in the school. A full review and evaluation of this policy will take place every two years.

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