



WHISTLE BLOWING POLICY

THIS MANUAL IS THE PROPERTY OF
BARKER ROAD METHODIST CHURCH

Issued By: GOVERNANCE COMMITTEE

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Part 1 – About this Policy

1. Objectives

The objectives of this policy are to:

- To provide avenues for the stakeholders (e.g. the general public, employees, volunteers, donors and beneficiaries) of Barker Road Methodist Church (BRMC) to raise concerns and define a way to handle these concerns;
- To enable the Local Church Executive Committee (LCEC) to be informed at an early stage about acts of misconduct;
- To reassure whistle blowers that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure; and
- To help develop a culture of openness, accountability and integrity.

2. Purpose and application

This policy is intended to be a reference for stakeholders of BRMC, e.g. staff, volunteers, donors and beneficiaries. Questions about this policy shall be directed to the Chairperson of the Governance Committee.

3. Approval of, and amendments to this policy

3.1 Approval of this policy

This policy is effective upon approval by the LCEC. Their effective date ('Effective Date') is shown on the front cover of this policy.

3.2 Amendments to this policy

All stakeholders are invited to suggest to the Chairperson of the Governance Committee, for formal consideration, changes, updates or other improvements to this policy.

However, any such suggestions and any changes, updates or other improvements proposed will not take effect unless and until the Chairperson of the Governance Committee:

- recommends them to the Chairperson of the LCEC and the Pastor-in-Charge
- to the extent that they jointly agree that they should be made, the Chairperson of the Governance Committee recommends them to the LCEC and
- they are approved by the LCEC.

Part 2 – About whistle blowing

1. Definition

Whistle blowing refers to a voluntary and deliberate disclosure by a stakeholder who has dealings with BRMC, to an appointed party by BRMC of any deliberate malpractice, illegal or unlawful conduct, or wilful omissions at work, or potential irregularities in procedures within BRMC. Such act or irregularity may be likely to be committed or in the process of committing or had been committed.

2. Responsibilities

The Chairperson of the Governance Committee has been appointed to handle all whistle blowing reports. The Chairperson of the Governance Committee, at his / her discretion, delegate the follow-up on the whistle blowing reports to any such person as deemed fit. The Chairperson of the Governance Committee shall be reporting to the LCEC on actions taken or to be taken in addressing the whistle blowing reports received.

3. Whistle blowing scope

The areas covered by this policy include, but not limited to, the following:

- Conduct which is an offence or breach of law;
- Impropriety, bribery, corruption, acts of fraud, theft and/or misuse of properties, assets or resources of BRMC;
- Concerns about financial & internal controls integrity of BRMC;
- Non-disclosure of conflict of interest;
- Breach of policies and procedures or code of conduct;
- Deliberate concealing of information about any ongoing or past malpractice or misconduct that has yet to be reported;
- Abuse of authority for personal gain;
- Intimidation or physical abuse of any personnel under employment or serviced; and
- Discrimination to any member of staff or service recipient on grounds of gender, race or disability.

4. Confidentiality of the whistle blower

BRMC shall treat all information received confidentially and therefore undertakes to treat all whistle blowing reports as either confidential or anonymous. The whistle blower may choose to remain anonymous or reveal his / her identity when making his report. Where the identity of the whistle blower is revealed, BRMC will keep the whistle blower's identity confidential

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and will not be disclosing his / her identity to any persons other than the appointed investigators, where necessary.

Exceptional circumstances under which information provided by the whistle blower could not or would not be treated with strictest confidentiality include:

- i. where BRMC is under a legal obligation to disclose information provided;
- ii. where the information is already in the public domain;
- iii. where the information is given on a strictly confidential basis to legal or any professionals for the purpose of obtaining professional advice; or
- iv. where the information is given to the police or other statutory authorities for criminal investigation.

In the event that BRMC is faced with a circumstance not listed above, where the revelation of the whistle blower's identity is deemed necessary, the Chairperson of the Governance Committee will endeavour to discuss this with the whistle blower first.

No action of any kind will be taken by BRMC against a whistle blower nor will his / her designation in BRMC be adversely affected by his / her merely raising the concerns / issues or making an allegation against a company official; provided always that he raises the concerns / issues or allegations in good faith and without malice and has reasonable ground believing them to be true.

Any malicious or frivolous complaint or allegation made by an employee against BRMC's official or fellow colleague, however, may result in BRMC, after proper investigation, taking disciplinary action against him / her.

Part 3 – Reporting procedure

1. Reporting options

The whistle blower may email or mail the subject matter to the Chairperson of the Governance Committee at wb@brmc.church or via the Church Office mailing address at 48 Barker Road, Singapore 309917. The emails will be checked by the Administration Director of Church and redirected to Chairperson of the Governance Committee. In the event that the matter concerned the Governance Chair, the emails will be sent to the District Superintendent.

2. Report format

The report must be in writing. Pertinent details including but not limited to, background, history of events and rationale of the subject matter shall be logged via the **Whistle Blowing Report (Appendix 1)**.

3. Acknowledgement of reporting

The Chairperson of the Governance Committee shall respond at least within 5 working days to acknowledge receipt of the whistle blowing report.

The whistle blower may follow up on the reported incident through the same mode of initial reporting with the Chairperson of the Governance Committee.

4. Assessment

All reports made in good faith shall be properly assessed, reviewed and dealt with. Considerations shall be given to the following factors when conducting the investigation:

- i. seriousness of the issue raised;
- ii. credibility of the concern or information; and
- iii. likelihood of confirming the concern or information from attributable sources.

The Chairperson of the Governance Committee shall decide on the need to appoint an internal investigator based on the merits of each report. Depending on the nature of the subject matter, the internal investigator may involve one or more parties from the following:

- i. external auditor;
- ii. internal auditor;
- iii. forensic accountant; or
- iv. the Police or Commercial Affairs Department.

Upon investigation, the appointed investigator shall submit a report detailing the investigation outcome. Based on the investigation report, the Chairperson of the Governance Committee, upon consultation with the Local Church Executive Committee, shall determine the appropriate actions to be taken to address the whistle blowing report received.

5. Closure

The Chairperson of the Governance Committee shall update the whistle blower on the outcome of the investigation, where feasible.

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The Administration Director shall maintain a **Whistle Blowing Log (Appendix 2)** for all whistle blowing reports received and update the said log after the investigation has concluded.

Part 4 – Appendices

Appendix 1	Whistle Blowing Report
Appendix 2	Whistle Blowing Log

Appendix 1 – Whistle Blowing Report

Date of incident(s)	Time of incident(s)	Location of incident(s)
Nature of incident(s)		
Name(s) of person(s) reported on	Department(s) of person(s) reported on	
Description of incident(s) <i>(including what happened, when it happened, how and why it happened)</i>		
Did you approach the person(s) reported on? If yes, what did the person (s) say?		
Have you reported the incident internally or through any other channels? If so, to whom was the report made to?		
What evidence do you have to support the incident?	Witness Details	
Signature of informant (Optional)	Date	
Name of Informant (Optional)	Informant's Relationship with BRMC:	
Contact No (Optional)		

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By submitting this form to BARKER ROAD METHODIST CHURCH ("BRMC"), I hereby warrant that all the information I am submitting in this Form is true and accurate to the best of my knowledge. I further understand that any personal data which I have provided in this form may be processed by BRMC or any of its agents and/or subcontractors ("BRMC's connected entities") both locally and overseas and I expressly consent to such processing for the purposes as set out in BRMC's Privacy Notice available at

<https://www.brmc.org.sg/wp-content/uploads/2022/07/BARKER-ROAD-METHODIST-CHURCH-Data-Protection-Notice-29-Jun-2021Final.pdf>

I also warrant that I have obtained all necessary consents from any third parties for BRMC to disclose any personal data belonging to such third parties as well as for the onward disclosure or processing of such third party's personal data by BRMC.

I understand that any personal data disclosed by me herein will be retained by BRMC and BRMC's connected entities as long as any of the purposes set out in BRMC's Privacy Notice remain valid.

For official purposes

Report No.: (e.g. WB/2017/001 denotes the 1 st whistle blowing report received for 2017)		
Date received	Receipt method (<i>interview, email, letter, phone etc.</i>)	Anonymous: Yes / No
Acknowledgement by Chairperson of Governance Committee		Acknowledgement by Pastor-in-Charge
Action taken:		
Further remarks:		

