



**BARKER ROAD
METHODIST CHURCH**

Whistle-Blowing Policy

Updated 7 February 2023

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Section 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 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 applies to all BRMC employees, members of the congregation, volunteers, donors, vendors, and members of the public. Questions about this policy shall be directed to the Chairperson of the Governance Committee.

Section 2 – About Whistle-Blowing

1. Definition

Whistle-blowing refers to a voluntary and deliberate disclosure by anyone 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.

This policy should be an avenue for staff or any person who may, in confidence, raise possible concerns of wrongdoing, improprieties in financial and other matters within BRMC.

2. Whistle blowing scope

2.1 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.

2.2 The policy does not cover grievances which deal with an individual or personal matter, and are not a whistle-blowing matter. Grievances should be directly addressed to the relevant supervisor or administration department and will be handled according to the BRMC Employee Handbook guidelines.

3. Confidentiality of the whistle-blower

- 3.1 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 and will not be disclosing his / her identity to any persons other than the appointed investigators, where necessary.
- 3.2 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.
- 3.3 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.
- 3.4 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.

4. Disciplinary Actions

Any malicious or frivolous complaint or allegation made by an employee may result in BRMC, after proper investigation, taking disciplinary action against the employee. If an allegation is made willfully or maliciously by any person, appropriate action may be taken against the person, including reporting the matter to the police.

Section 3 – Reporting procedure

A whistle-blowing report may be raised in writing to the Governance Committee Chairperson.

1. Reporting options

The whistle-blower may email or mail the subject matter to the Chairperson of the Governance Committee at wb@brmc.org.sg or via the Church Office mailing address at 48 Barker Road, Singapore 309917. The emails will be checked by the Director, Finance & Administration of the 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. Reporting channels

Email: wb@brmc.org.sg

Mail: Barker Road Methodist Church

48 Barker Road, Singapore 309917

In the event the matter concerns the Governance Committee, the matter will be directed to the District Superintendent for BRMC.

4. Acknowledgement of reporting

Where contact information has been provided, the Governance Committee Chairperson shall send an acknowledgment within 5 business days to the whistle-blower that the concern raised has been received.

5. 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 If the concern raised is valid or substantial to warrant investigation. The Governance Committee will decide whether to appoint an investigator.

The investigation 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. The consultation on the report and any action should be made with the LCEC Chairperson

6. Closure

The Governance Committee Chairperson shall, where feasible, update the whistleblower on the outcome of the investigation. The LCEC will be updated accordingly.

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

Section 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)		

BRMC Whistle-Blowing Policy

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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:		

Appendix 2 – Whistle Blowing Log

Date of Report	Received by	Report No.	Resolved (Y/N)	Date of Resolution Confirmed by Chairperson of Governance Committee