



## WHISTLE-BLOWING POLICY

### 1. FOREWORD

1.1 This Whistle-Blowing Policy applies to Charis Methodist Church (CMC).

1.2 The objectives of this policy are:

- 1.2.1. to provide a platform for employees, volunteers, business partners, and other stakeholders to raise concerns around unethical behaviour in the workplace;
- 1.2.2. to ensure that such concerns are treated seriously and appropriately;
- and
- 1.2.3. to ensure that any person(s) raising such concerns in good faith will be protected from reprisals or retaliation.

1.3 CMC envisages an environment where timely and appropriate actions are taken to deal with misconduct or malpractice, thereby propagating a culture of integrity and transparency. By providing a clear procedure to report and investigate any suspicion of misconduct and/or any breach of law or regulation, we are also protecting CMC from exposure to regulatory and/or criminal liability that may result in reputational or financial loss.

1.4 Whistle-blowing is the disclosure by a person in an organisation, termed a whistle-blower, to those in authority, of mismanagement, corruption, illegality, unethical activities, or some other wrongdoing within the organisation.

1.5 The Church Governance Committee is responsible for initiating any reviews and update to these guidelines.

### 2. SCOPE

2.1 This policy outlines the reporting process for serious and sensitive concerns, defined as any (suspicion of) misconduct, irregularity, breach of law, regulation, code, principle, or policy, that could have an adverse impact on the operations and performance of CMC and which, due to the nature of the concern, cannot be reported through the normal reporting line.

2.2 This policy does not cover grievances. Grievance deals with an individual or personal matter and is not a whistle-blowing concern. Grievances should be directed to the Pastoral team.

2.3 This policy relies upon the reasonable belief of employees, volunteers, business partners, and other stakeholders, and should not be used as a mechanism for raising malicious or unfounded allegations against colleagues.

2.4 The nature of the concerns (known or suspected misconduct) covers any of the following acts, including but not limited to:



- 2.4.1 abuse of power or authority;
- 2.4.2 financial fraud e.g. misappropriation of assets, embezzlement of funds, accounting manipulation;
- 2.4.3 non-compliance with internal controls procedure or Code of Conduct;
- 2.4.4 material conflicts of interest without disclosure;
- 2.4.5 bribery and corruption e.g. inappropriate personal gain, gift, or facilitation payments;
- 2.4.6 serious endangerment to environment, health, and safety of individuals;
- 2.4.7 breach of law and justice;
- 2.4.8 improper conduct or unethical behaviour; and/or
- 2.4.9 concealment, or deliberate failure to report, a known control breach or weakness.

#### 2.5 Benefits to CMC:

- 2.5.1 Increases the likelihood of alerting management/church leaders to problems so that these concerns can be addressed before damage is done or prevent (further) damage; and
- 2.5.2 Helps to deter employees/members from engaging in irregularities by strengthening the atmosphere of openness, transparency, and integrity.

### **3. REPORTING PROCEDURE**

3.1 CMC encourages whistle-blowers to put their names to their submission.

Concerns expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the issue raised and the likelihood of confirming the allegation from attributable sources and information provided.

3.2 Concerns may be raised in writing marked "Private and Confidential" to:

3.2.1 Church Governance Chairperson

Charis Methodist Church, 91 Koon Seng Road S(427032) or email:

[governance@charismc.org.sg](mailto:governance@charismc.org.sg)

3.2.2 As it is essential for CMC to have all critical information in order to be able to efficiently evaluate and investigate a complaint, the report on concerns made should provide as much detail and be as specific as possible. The report should include:

- 3.3.1 background, history, and reason for the concern;
- 3.3.2 dates or period of time;
- 3.3.3 nature of concern;
- 3.3.4 name of the person involved in the events;
- 3.3.5 evidence substantiating the concern e.g. documents, e-mails, voice loggings, or witness;
- 3.3.6 contact details (in case further information is required).

3.4 The whistle-blower who reports a concern must meet any reasonable request to clarify any facts and/or circumstances, to provide (additional) information, and to cooperate with an investigation. A lack of information can be a reason to decide not to conduct an investigation and/or to conclude that the concern has no factual basis.



3.5 The whistle-blower is required to keep all information confidential.

3.6 Allegations made in bad faith may result in disciplinary or other appropriate action.

3.7 CMC will ensure that no disciplinary measures or other steps will be taken against the whistle-blower in case a genuine concern later turns out to be mistaken, misguided, or inconclusive.

#### **4. HANDLING OF REPORTING AND INVESTIGATION**

4.1 All concerns received, per Section 3 above, will be directed to the Church Governance Committee for its action.

4.2 CMC reserves the right to refer any concerns to the appropriate external regulatory authorities.

4.3 Church Governance Committee will decide on the appropriateness of placing any investigation report before the Local Church Executive Committee (LCEC), depending on the gravity and magnitude of the violation.

#### **5. REMEDIAL ACTION**

5.1 If, at the conclusion of an investigation, Church Governance Committee determines that a violation or allegation(s) is substantiated, effective and appropriate remedial action commensurate with the severity of the offence will be taken by the appropriate authority.

5.2 Whistle-blower will receive an acknowledgement.

#### **6. PROTECTION AND CONFIDENTIALITY**

6.1 CMC will treat all concerns and issues raised under this policy in a confidential manner except to the extent necessary to conduct a complete and fair investigation or as required by law. The identity of the whistle-blower shall be kept confidential.

6.2 If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, CMC will inform the whistle-blower prior to such disclosure.

Revised and Approved by Charis MC LCEC, 20 January 2023