

**BEDOK METHODIST CHURCH (BMC)  
WHISTLE-BLOWING POLICY**

**1. OBJECTIVE**

- 1.1 To set out a whistle blowing policy for BMC.
- 1.2 Whistle-blowing is the disclosure by a person who is usually an employee in an organisation (termed a whistle-blower), of mismanagement, corruption, illegality, or some other wrongdoing within an organisation.
- 1.3 The objectives of this policy are:
  - 1.3.1 to provide a platform for employees, volunteers, business partners, and other stakeholders to duly disclose mismanagement, corruption, illegality or some other wrong doing, in BMC.
  - 1.3.2 to ensure that such concerns are treated seriously and appropriately, and
  - 1.3.3 to ensure that that any person(s) raising such concerns in good faith will be protected from reprisals or retaliation.
- 1.4 BMC envisages an environment where timely and appropriate actions are taken to deal with misconduct or malpractice, thereby promoting a culture of integrity and transparency.
- 1.5 BMC's Local Church Executive Committee (LCEC) 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 (or suspicion of) misconduct, irregularity, breach of law, regulation, code, principle, or policy, that could have an adverse impact on the operations and performance of BMC and which, due to the nature of the concern, cannot be reported through the normal reporting line.
- 2.2 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.
- 2.3 The nature of the concerns covers, but is not limited to, any of the following acts:
  - 2.3.1 abuse of power or authority;
  - 2.3.2 financial fraud e.g. misappropriation of assets, embezzlement of funds, accounting manipulation;
  - 2.3.3 non-compliance of internal controls procedure or applicable code(s) of conduct;
  - 2.3.4 material conflicts of interest without disclosure;
  - 2.3.5 bribery and corruption e.g. inappropriate personal gain, gift, or facilitation payments;
  - 2.3.6 serious endangerment to environment, health, and safety of individuals;

- 2.3.7 breach of law and justice;
  - 2.3.8 improper conduct; and
  - 2.3.9 concealment, or deliberate failure to report, a known control breach or weakness.
- 2.4 This policy does not cover grievances. Grievance relates to an individual or personal matter and is not a whistle-blowing concern.

### **3. REPORTING PROCEDURE**

- 3.1 BMC 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 The whistle-blower may make report via email to: [governance@bmc.org.sg](mailto:governance@bmc.org.sg) or submit a written and sealed report, marked 'Private & Confidential' to [*BMC Church Office*], attention to: Church Governance Chairperson ("Governance Chairperson").
- 3.3. As it is essential for BMC to have all critical information in order to be able to efficiently evaluate and investigate a concern, the report should include: (a) background, history, and reason for the concern; (b) date(s) or period of time; (c) nature of concern; (d) name of the person involved in the events; (e) evidence substantiating the concern (eg. documents, e-mails, voice logs, or witness); and (f) 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, provide information, and 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 No disciplinary measure or other step will be taken against the whistle-blower in the case of a concern made in good faith which later turns out to be mistaken, misguided, or inconclusive.
- 3.8 The LCEC will be kept informed of all whistle-blowing cases.

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

- 4.1 All concerns received in accordance with Section 3.2 above will be directed to the Governance Chairperson and/or his delegate.
- 4.2 Upon receipt of concerns either via the whistle-blower report or email, the Governance Chairperson and/or his delegate shall:
- 4.2.1 record all reported concerns in a master register;

- 4.2.2 form a whistle-blowing panel (the "Panel") comprising the LCEC Chairperson, Governance Chairperson, PPRC Chairperson, Personnel Management Chairperson and Finance Chairperson. Where the report or concern is made against or relates in any way to a member of the Panel, that member shall recuse him/herself) from any deliberations and decisions relating to the convening of an investigation into that report/concern and the manner in which that investigation shall be conducted.
  - 4.2.3 inform the Panel of the whistle-blowing concern and provide the Panel with a copy of the whistle-blowing report and/or other information received in connection with the whistle-blowing report;
  - 4.2.4 arrange a meeting of the Panel; and
  - 4.2.5 send an acknowledgement to the whistle-blower informing that the concern has been received.
- 4.3 The Panel shall:
- 4.3.1 review the details provided by the whistle-blower;
  - 4.3.2 consider the seriousness and credibility of the concern raised; and
  - 4.3.3 decide on action to be taken with respect to the concern raised.
- 4.4 The Panel may appoint an independent committee of inquiry ("COI") or appropriate advisor or external service provider to assist in conducting an investigation where necessary. Where the whistle-blower has provided contact details, he/she may be contacted for further clarification or information.
- 4.5 The Panel may, in consultation with LCEC, refer any concern at any time to the appropriate regulatory authorities.
- 4.6 Depending on the nature of the concern, the Panel may inform the subject of the concern of the allegations against him/ her and provide him/her with an opportunity to reply to such allegations. Any such communication must be strictly confidential and must preserve the anonymity of the whistle-blower.
- 4.7 All concerns received in accordance to paragraph 3.2 will be reviewed as provided in paragraph 4.2 and 4.3 within a reasonable timeframe, but not in excess of 30 days unless there are circumstances that require an extension.
- 4.8 When deemed appropriate by the Panel, an Inquiry Committee may be convened by the Panel comprising independent LCEC and/or Sub-Committee members as soon as possible; but no later than 30 days from the date of the completion of the review stated in paragraph 4.7 above. The Inquiry Committee shall complete its investigations and submit its findings no later than 90 days of being convened. The Inquiry Committee may request for an extension of time to the Panel to submit its findings, and Panel shall consider such requests on a case by case basis.
- 4.9 The process for the review in 4.7 till the submission of findings in 4.8 shall take no longer than 180 days from the receipt of the whistle-blower report by the Governance Chairperson. The Inquiry Committee may request for an extension of time to LCEC to complete its investigations and submit its findings and LCEC shall consider such requests on a case by case basis.

- 4.10 The report of the Inquiry Committee will be reviewed by the Panel and its findings recorded.
- 4.11 The Panel will decide on the appropriateness of placing any report of the Inquiry Committee, once completed, before LCEC, depending on the gravity and magnitude of the violation.
- 4.12 With regards to a whistle-blower report against a minister or lay person, the disciplinary proceedings for Inquiry Committee, Committee of Investigation and Disciplinary Panel specified in para 742-761 (minister) and para 762-774 (lay person) of the Book of Discipline shall be adopted, if applicable.

## **5. REMEDIAL ACTION**

- 5.1 If, at the conclusion of an investigation, the Panel determines that a violation or allegation(s) is substantiated, effective and appropriate remedial action commensurate with the severity of the offence will be recommended to the appropriate authority.
- 5.2 The Whistle-blower will receive a notification of the outcome.

## **5. PROTECTION AND CONFIDENTIALITY**

- 5.1 BMC 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 will be kept confidential.
- 5.2 If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, BMC will inform the whistle-blower prior to such disclosure.

*Adapted from TRAC Whistle-blowing Policy, November 2019  
Revised and Approved by BMC LCEC, 17 July 2022*