

SINGAPORE DISABILITY SPORTS COUNCIL WHISTLE BLOWING POLICY

1. INTRODUCTION

1.1 Purpose

The Whistle-Blowing Policy aims to provide a formal process and assuring framework for employees and members of the public to report improper, unethical and inappropriate behavior, so that SDSC may take up timely and appropriate action to safeguard a culture of accountability, integrity and transparency.

1.2 Scope

To whistle-blow is to report concerns on actual, suspected or anticipated individual or organizational wrong-doing (including violation of policies) of a legal, regulatory or ethical nature. The Whistle-Blowing Policy is intended to cover major concerns that fall outside the scope of other procedures. It does not cover grievances (concern of an individual or personal matter) which can be addressed by other existing procedures or channels.

Whistle-blowing concerns include the following non-exhaustive list:

- An offence or breach of law (e.g. Personal Data Protection Act – information security)
- Vandalism or damage to SDSC property
- Fraud (e.g. accounting fraud, theft, corruption, bribery, embezzlement, misuse of SDSC resources)
- Abuse of power (e.g. bullying, harassment, conflicts of interest)
- A deliberate attempt to cover up any of the above

1.3 Governance

This policy shall be governed by SDSC's Audit Subcommittee, which is a non-executive body independent of SDSC's Executive Committee (ExCo) and secretariat.

2 GUIDELINES

2.1 Confidentiality

All concerns will be treated in confidence and SDSC shall be committed to preserve confidentiality by keeping the report and case information, including the identities of those involved in the case, secure and accessible only to designated persons. The final investigation report shall not contain the identity of the whistle-blower.

Exceptions may be taken if necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, or if such information is already in the public domain.

2.2 Protection

SDSC does not condone any retaliation against anyone for raising a concern in good faith. Disciplinary actions will be taken against those who retaliate, harass or discriminate against the whistle-blower.

2.3 Anonymity

The whistle-blower may file a report anonymously. However, SDSC may not be able to follow up on anonymous reports should there be any pertinent information missing.

2.4 Reporting

- (i) Employees and members of the public can lodge reports to SDSC's Executive Director (ED) via the email address: ed@sdsc.org.sg. The ED shall escalate the matter to the Audit Subcommittee. An acknowledgement of receipt shall be sent to the whistle-blower, if the identity is known.
- (ii) In cases where the Executive Director is involved in the concern, the whistle-blower can raise the report directly to the Audit Subcommittee via the email address: audit@sdsc.org.sg. The report sent through this email address shall be received by the Audit Subcommittee's Chairperson and its members. An acknowledgement of receipt shall be sent to the whistle-blower, if the identity is known.
- (iii) Reports can also be lodged in hardcopy to the mailing address:

Singapore Disability Sports Council
3 Stadium Drive, #01-34
Singapore 397630
Attention to: Executive Director / Audit Subcommittee

Reports received in hardcopy shall be handled in the same manner, as stated in 2.4(i) and 2.4(ii).

- (iv) Reports must include sufficient details such as the names of those involved, dates, locations and documents or logs that can aid an effective assessment and investigation.
- (v) Allegations of misconduct or malpractice are serious matters. They involve significant amount of time, effort and resources of the organization, and has serious implications on the alleged parties' reputation. Any whistleblower is advised to state the facts in good faith, and exercise due diligence in establishing the veracity of the allegation before making such reports.
- (vi) In addition, no whistle-blower should treat the press or any public domain as a priority channel to submit concerns. Such actions, in the absence of proper investigation, may lead to unfair and unnecessary reputational consequences on those involved in the allegation.

2.5 Assessment and Investigation

- (i) The Audit Subcommittee shall analyse and evaluate the alleged concerns to determine whether the concerns raised are appropriate (i.e. they are not grievances), and warrant an investigation (i.e. the allegation can be substantiated). Matters assessed and concluded to be grievances or malicious will not be further investigated. The responsible employee may also be subject to disciplinary action. Similar actions may be taken against members who willfully or frivolously abuse the Whistle-Blowing policy for malice or personal benefit.
- (ii) Should there be sufficient grounds to carry out a detailed investigation, the Audit Chairperson shall inform the SDSC ExCo and a Committee of Inquiry (COI) will be formed to gather evidence to support decisions or

recommendations arising from the investigation. The ExCo shall review and approve the recommended course of action from the COI.

- (iii) The whistle-blower shall be provided with subsequent information on the follow-up processes as appropriate. The whistle-blower may also be contacted for further clarification.

2.6 Outcomes

If there are grounds for the concern, disciplinary actions (e.g. reprimand, suspension, termination) would be taken by SDSC, together with remedial measures to mitigate risk of recurrences. If there are grounds for a possible criminal offence, SDSC's legal advisor shall recommend whether the matter should be referred to the relevant authority for appropriate action.

3 DOCUMENT LOG

Document / Section & Clause	Details of Revision	Approved by Exco
Whistle Blowing Policy	N.A.	23 Jan 2020