

## **Whistle Blowing Policy**

### **Purpose:**

The Riding for the Disabled Association of Singapore (RDA) is committed to the highest standards of ethical & responsible conduct in its operations.

This whistle blowing policy is intended to encourage and enable employees and other stakeholders to raise serious concerns, based on good faith & a reasonable belief that it is factual & substantially true, within the organization rather than overlooking the problem or 'blowing the whistle' outside. It also serves to deter malpractice & promote the best practice of corporate governance at the workplace.

The Audit & Risk management Sub-Committee has the overall responsibility for the maintenance & operation of this policy.

### **Scope:**

This policy applies to all employees and all other stakeholders including clients & parents/care-givers, volunteers, donors, partners, business associates and suppliers.

### **Policy**

This policy aims to:

- encourage staff and other stakeholders to feel confident in raising serious concerns about any aspect of our operations.
- provide an avenue for employees and other stakeholders to raise these concerns in confidence.
- reassure employees and other stakeholders that they will be protected from possible reprisals or victimization if they have a reasonable belief that they had made any disclosure in good faith.

The whistle blowing policy is intended to cover serious concerns that might be beyond the scope of other procedures (such as complaints & grievances and disciplinary procedures). These serious concerns may include the following severe breaches of the code of conduct or violations of law but are not limited to:

- possible fraud or corruption
- misappropriation of assets or funds
- conduct which is an offence or a breach of the law
- health and safety risks, including risks to the public as well as other employees and stakeholders
- criminal activities
- sexual, physical or emotional abuse

## Confidentiality

All concerns reported will be treated in confidence and every effort will be made not to reveal the identity of the whistle blower if requested. At the appropriate time however, the whistle-blower may be required to come forward as a witness.

The identity of the whistle-blower would be kept confidential, with the exception of the following situations:

- a) When required by law, to reveal the identity of the whistle-blower
- b) When the whistle-blower waives the right to confidentiality
- c) When the identity of the whistle-blower is already publicly known

## Anonymous Allegations

This policy encourages the whistle-blower to put his/her name to allegations.

Concerns expressed anonymously will be considered on the basis of its merits and at the discretion of the Audit Sub-Committee.

In exercising this discretion, the factors to be taken into consideration would be:

- the seriousness of the allegation
- the credibility of the complaint
- the likelihood of confirming the allegation from attributable sources.

Vague or insufficient information will impede the investigation process and its outcome. Whistle-blowers are encouraged to provide as much details as possible.

## Procedure

### How To Raise A Concern

Any report should be based on good faith with a reasonable belief that the information & allegation are factual and substantially true.

As an initial step, the employee or stakeholder should normally raise such concerns with his/her immediate superior of the staff involved, or the Volunteer Coordinator if it involved a volunteer.

However, this depends on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For instance, if it is suspected that senior management is involved, then the concern could be raised in a written form and addressed to:

Chairman, Audit & Risk Management Sub-Committee  
Riding for the Disable Association of Singapore  
5 Jalan Mashhor, RDA Centre  
Singapore 299174

Or to [whistleblowing@rdasingapore.org.sg](mailto:whistleblowing@rdasingapore.org.sg) which is an account owned by Chairman, Audit Sub-Committee.

Annex A - Report Template outlines the information that should be provided that will assist in the investigation.

While is not expected, at this initial point of allegation, to show proof beyond a doubt, the whistle-blower will need to demonstrate that there are reasonable grounds for the concern.

#### Actions To Be Taken

The action taken by the Audit & Risk Management Sub-Committee will depend on the nature of the concern. In exercising discretion, the factors taken into account would include:

- the seriousness of the concern raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from attributable sources

The Audit & Risk Management Sub-Committee may respond in several ways:

- direct management, if appropriate, to conduct an investigation according to the disciplinary process, and/or to take necessary corrective actions to resolve if it concerned an operational issue that should be under management purview
- convene an independent committee consisting of the Committee, relevant Sub-Committee Members or external expertise to conduct an inquiry
- refer the matter to the appropriate public authority such as the police or ministry

In order to maintain the integrity of the policy and protect against frivolous accusations, the Audit & Risk Management Sub-Committee may choose to conduct initial enquiries to ascertain if the allegation warrants further action or investigation, and if so, what form it should take.

If the identity of the whistle-blower is known, Chairman, Audit & Risk Management Sub-Committee or his designee will respond, within two to three weeks from the receipt of the written allegation, to the whistle-blower:

- acknowledging that the concern has been received
- requesting for more information from the whistle-blower as necessary, and
- provide an update, if any, on proceedings

Chairman, Audit & Risk Management Sub-Committee or his designee will make known the outcome of any investigation or proceedings to the whistle-blower upon its conclusion.

#### Reporting

The Audit & Risk Management Sub-Committee will maintain a record of concerns raised and the outcome. It will report as necessary to the Committee.

Annex A - Report Template

<b>Informant Name</b>		<b>NRIC /FIN</b>	<b>Date of report</b>
<b>Contact details</b>	<b>Tel. No. (home / mobile / office)</b> <i>(include a convenient time to be contacted)</i>		
	<b>Email</b>		
<b>Reason(s) for reporting</b>			
<b>Impropriety</b>			
Nature			
<b>Details / Facts</b> <i>(E.g. date of incident, how was incident discovered, how long has the impropriety been happening, contract, value, documentation of evidence where available, etc.)</i>			
Alleged perpetrator(s)			
Department(s) / companies involved			