



HOLLAND-BUKIT PANJANG TOWN COUNCIL

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Whistle-Blowing Policy for Holland-Bukit Panjang Town Council

Purpose

The implementation of the Whistle-Blowing Policy underpins Holland-Bukit Panjang Town Council's (HBPTC) efforts towards upholding its stance of zero tolerance against detrimental action and improper conduct which may cause finance or non-financial loss to HBPTC or damage to HBPTC's reputation. The objectives of this Policy are to provide:

- Avenues for Whistle-blower to report to the Town Council (TC) if he/ she observes or discovers any detrimental action and improper conducted of employees (including MA staff), council members or contractors in the Town Council; and
- Assurance that no adverse personnel action would be taken against Whistle-blower in retaliation for his/ her disclosures in good faith of any detrimental action or improper conduct.

Detrimental actions may include

- any reprisal action which shall include action causing injury, loss or damage;
- intimidation or harassment;
- interference with the lawful employment or livelihood, including discrimination;
- discharge, demotion, suspension, disadvantage, termination, adverse treatment; and
- a threat to take any of the above actions.

Improper conduct may include

- any unethical behaviour;
- malpractices;
- illegal acts or any other wrongful or improper conduct within TC which is proven, constitutes a disciplinary offence or a criminal offence.

Reporting process

Whistle-blower who is aware of any suspected detrimental action and improper conduct carried out by any employees (including MA staff), council members, contractors of the TC should make a written report (in sealed envelope marked "Private & Confidential") as soon as possible to the TC's Secretary or TC Chairman/ Vice Chairmen to the following address:

Block 256 Bangkit Road #01-71 Singapore 670256

If, for whatever reason, the Whistle-blower is not comfortable in reporting to the Secretary, he/ she should report the matter directly to TC Chairman/ Vice Chairmen through their email, which can be obtained through enquiry by secretary@hbptc.org.sg.

The content of the mailed report/ email shall include the following:

- The name and address of the Whistle-blower
- The time and date of the alleged act that had taken place
- Clear description of the alleged act
- Documentary/audio/visual evidence of the alleged act committed (if available)

All concerns raised would be treated with strict confidentiality. Whistle-blower is expected to identify himself/ herself when raising a concern. This will enhance the accountability and effectiveness of the investigation and facilitate feedback to the Whistle-blower. It must be appreciated that the investigation process may sometimes require the Whistle-blower to render assistance in the investigation.

A complaint can be made even if the Whistle-blower is not able to identify a particular person to which the Detrimental Actions or Improper Conduct relates.

Anonymous complaints would be investigated only if there are clear merits for continuity.

Investigation procedures

1. TC Secretary or Audit Committee directed by the TC Chairman will lead the investigation. Such investigation will be conducted in a fair manner as a neutral fact-finding process and without any presumption of guilt. Where necessary, the investigation team should consult and seek legal advice. Where criminal offence and corruption are involved, the matter may be referred to the Police or the Corrupt Practices Investigation Bureau (CPIB).
2. The investigation team should handle all matters with confidentiality and complete the investigation promptly. All relevant documents received by investigation team shall be recorded and filed.
3. To safeguard against possibility of bias, prejudice or conflict of interest, the person being complained shall not participate nor be involved in the investigation team.
4. The investigation team shall outline the detailed procedures for the investigation. In discharging its responsibility, the delegated investigation team shall have access to TC's management, books and records which the investigation team believes to be relevant to the complaint and shall be entitled to examine any employee or any other person(s) as it deems appropriate and to receive such information as it requires from them. All relevant personnel shall co-operate with any reasonable request made by the investigation team.
5. Upon receipt of the report on the findings of the investigation, TC Chairman/ Vice Chairmen will review and evaluate the findings. If the TC Chairman or TC Vice Chairmen is not satisfied with the findings of the investigation, the TC Chairman or TC Vice Chairmen has the right to either:
 - Direct a fresh investigation or request that further investigation be conducted by the same investigation team or a fresh investigation by an investigation team consisting of new members;
 - Conduct its own investigation.
6. Disciplinary action may be taken against the parties reported. Corrective action would be taken to address any lapses in controls and procedures, if applicable.

7. If the detrimental action or improper conduct is proven, the TC Chairman/ Vice Chairmen shall decide on the appropriate course of action to be taken, which may be any of the following:
 - i. Against the employee (including MA staff), council member or contractor found to have committed the detrimental action or improper conduct:
 - Reprimand, take disciplinary action, impose punishment
 - Transfer to another department/ relocation of place of employment
 - Termination or suspension of employment
 - Report the matter to the relevant authorities
 - Any other action deemed appropriate by TC
 - ii. Preventive measures for the future:

Make recommendations to the relevant department to implement procedures or take preventive measures to minimize or prevent the occurrence of the detrimental action or improper conduct in the future.
8. The decision on the corrective actions to be taken and the action taken against the person(s) found to have committed the detrimental action or improper conduct shall be communicated in writing to the Whistleblower.
9. Complaints relating to the TC Chairman/ Vice Chairmen will be referred to Audit Committee (AC), who will be responsible for commissioning the investigation and decide how the investigation will proceed.

Protection of Whistle-blower

Protection will be provided to the Whistle-blower so that the person against whom a complaint is made could not take retaliation on the Whistle-blower. The protection accorded to the Whistle-blower is not limited or affected in the event that a complaint made by the Whistle-blower in good faith does not lead to any corrective action taken against the person(s) against whom the complaint or report has been made.

Whistle-blower, who has reported a concern which is subsequently found to be unsubstantiated, should not be subject to any disciplinary action if he/ she has reported the concern in good faith. However, if the complaint is made out of a malicious, frivolous and vexatious allegation or consideration of personal gain, the Whistle-blower may be subject to disciplinary or police action.

Complaint register

TC Chairman/ Vice Chairmen shall maintain a Complaint Register for the purpose of recording details of all complaints received, including the date, the nature and the status of such complaint. The Complaint Register shall be handed over to succeeding TC Chairman/ Vice Chairmen.