

# **Zion Bishan Bible-Presbyterian Church Whistle-Blowing Policy**

## **1. PURPOSE**

- 1.1 Zion Bishan Bible-Presbyterian Church (the “Church”) is committed to good governance and requires its leaders and employees to observe honesty and integrity in fulfilling their responsibilities in compliance with all applicable laws and regulations.
- 1.2 The objective of this Policy is to establish a confidential channel within the Church for Church members, employees or external parties to report genuine concerns about suspected illegal, unethical or inappropriate conduct or practices occurring within, by or under the control of the Church, so that the Church may evaluate such concerns and take appropriate follow-up action.

## **2. WHISTLE-BLOWERS**

- 2.1 A whistle-blower is an individual who, in good faith, reports any suspected or actual illegal, unethical or inappropriate conduct or practices occurring within, by or under the control of the Church.
- 2.2 A report is made in good faith when it is made out of genuine concern, without malice, recklessness or consideration of personal benefit and the individual has a reasonable basis to believe that the report is true. A report is not made in good faith when it is made maliciously, recklessly or known to be false.

## **3. REPORTABLE MATTERS**

- 3.1 A reportable matter is one which
  - (i) is not undertaken in good faith,
  - (ii) could result in legal, financial or reputational loss to the Church, and
  - (iii) occurs within, by or under the control of the Church.
- 3.2 Reportable matters under this Policy include, but are not limited to, the following:
  - Fraudulent activities or transactions;
  - Embezzlement, cheating, misappropriation, theft, or criminal misuse of the Church’s funds or resources;
  - Abuse of power or authority;
  - Personal and/or professional misconduct;
  - Unauthorised access to or disclosure of confidential information;
  - Corruption or bribery;
  - Aiding or abetting illegal activities;

- Concealment or wilful suppression of malpractice or misconduct;
  - Any form of bullying or harassment;
  - Endangerment or likely endangerment of health or safety of persons or the environment; and
  - Any action which would cause harm to anyone in the congregation, in particular, children, elderly or other vulnerable persons.
- 3.3 Feedback on doctrinal or theological concerns, the quality of the Church's programmes or services, or private grievances are not reportable matters under this Policy and may be directed to the Pastors or ministry leaders as appropriate.
- 3.4 Employees should first discuss their concerns with their immediate supervisor. If this does not resolve the employee's concern, or if the employee is uncomfortable speaking with his/her supervisor, the employee may convey his/her concern to the HR Committee Chairman under this Policy.
- 3.5 Similarly, Church members or attendees should first raise concerns with ministry leaders. If this does not resolve the concern, or if the Church member/attendee is uncomfortable speaking with the ministry leader, the Church member/attendee may submit a report using the process detailed in this Policy.

#### **4. PROTECTION AGAINST REPRISAL**

- 4.1 The Church will not tolerate harassment or victimisation of whistle-blowers. No Church member or employee who, in good faith, reports a genuine concern under this Policy shall be subject to retaliation or, in the case of an employee, adverse employment consequences.
- 4.2 However, the Church does not condone frivolous, mischievous, reckless or malicious allegations. Church employees or members making such allegations will be subject to disciplinary action.

#### **5. CONFIDENTIALITY**

- 5.1 Whistle-blowers are encouraged to identify themselves in their reports, in case further information or clarification is required. Concerns expressed anonymously will be investigated on the basis of their merits, but anonymous information may be more difficult to act upon effectively, as vague or insufficient information may impede the investigation process.
- 5.2 The Church will endeavour not to reveal the identity of the whistle-blower unless the whistle-blower authorises the Church to do so. However, the Church may not be able to maintain the whistle-blower's identity or other information in strict confidence in exceptional circumstances including but not limited to the following:

- a) Where the Church is under a legal obligation to disclose part or all of the information provided;
- b) Where the information is already in the public domain;
- c) Where the information is given on a confidential basis to the Church's legal advisers or auditors for the purpose of obtaining professional advice; or
- d) Where the information is given to the police or other governmental authorities for formal investigation.

## **6. WHISTLE-BLOWING CHANNELS**

- 6.1 Concerns may be raised in writing to the Senior Pastor, Audit & Risk Committee Chairman or Human Resource Committee Chairman.

Rev Dr Alby Yip, Senior Pastor ([alby@zionbishan.org.sg](mailto:alby@zionbishan.org.sg))

Elder Chan Soon Huat, Audit & Risk Committee Chairman ([chan8318@yahoo.com](mailto:chan8318@yahoo.com))

Elder Reginald Tan, Human Resource Chairman ([reginald@nus.edu.sg](mailto:reginald@nus.edu.sg))

- 6.2 The information reported should be as specific as possible, including details such as the identities of the parties involved, the nature and description of the incident or impropriety, the relevant dates or period of time, evidence substantiating the concern raised, where possible, and contact details.
- 6.3 All concerns raised will be independently evaluated. A Whistle-Blowing Committee will determine responses to the concerns as well as who will be informed of and/or enlisted to assist in investigations.
- 6.4 The whistle-blower may request updates on the progress of the investigations and, if appropriate, will be kept notified of the progress and the final outcome.