



## **Whistle Blowing Policy**

Jurong-Clementi Town Council employs staff directly as well as appoint a managing agent that provides staff to perform various functions entrusted under the Town Councils Act.

### General Scope of Policy

This policy applies to all employees either directly employed by the Town Council or through the managing agent. The Town Council aims to instill an ethical and socially responsible environment. This policy:

- 1) encourages any employee to come forward and report instances of improper conduct
- 2) protects the individual who reports such incidents, whether actual or suspected but in good faith, from any form of retribution
- 3) ensures that all reports are thoroughly and promptly investigated and that corrective or disciplinary action taken

### Definitions

An allegation of misconduct means conduct, which, in the view of the reporting individual acting in good faith, is:

- dishonest
- fraudulent
- corrupt
- illegal
- a violation of any law, rule or regulation of Singapore

Acting in good faith means acting on an honest belief when giving an honest, sincere and complete report. Simply stated, it does not matter whether the belief that a breach may have occurred was mistaken



Whistle blower refers to any person who reports an allegation of misconduct by any employee of the Town Council or its managing agent

### Reporting Procedure

#### Situation A

If the report is against the General Manager/Secretary of the Town Council, the whistle blower can report the matter to the Chairman of The Town Council directly.

#### Situation B

A whistle blower can report the incident directly to the General Manager/Secretary of the Town Council, if the report is against a staff other than the General Manager/Secretary of the Town Council.

Please refer to the attached flow charts for the reporting procedures.

### Investigation Procedures

The Town Council Chairman shall initiate an investigation upon receipt of a report on suspected misconduct and appoint an independent working committee to conduct the investigation.

The working committee may comprise of officers and/or, Town Councillors.

The working committee shall review all the evidence, interview with the suspect(s) and witness(es) during the investigation process.

The interviews with suspect(s) and witness(es) shall be recorded and minuted.

After the investigation is completed, the lead investigation officer shall compile a report with all evidence and interview minutes and submit it to the Town Council Chairman for review.

The Town Council Chairman, shall review and evaluate the report with all evidence and determine if

- A fresh investigation shall be conducted again by a fresh team of investigators.
- Request that further investigation be conducted by the same investigation team.
- Choose to conduct his own investigation if required
- Conclude and close off the investigation

Where necessary, the Town Council shall consult and seek legal advice. For criminal offences and corruption cases, the matter may be referred to the Singapore Police Force (“SPF”) or the Corrupt Practices Investigation Bureau (“CPIB”).

If any improper/ inappropriate practice and misconduct is proven, the Town Council Chairman shall decide on the appropriate course of action to be taken that includes



- Reprimand and/or take disciplinary action
- Transfer employee to another department or office
- Termination or suspension of employment or contract with any third-party vendors and report the matter to relevant authorities
- Any other action deemed appropriate by the Town Council

The Town Council Chairman shall then communicate the result and the course of actions taken in writing to the suspect.

The Town Council Chairman shall communicate to the whistle-blower in writing on the corrective actions to be taken in the future and the action taken against the alleged.

#### Appointment and composition of the investigation panel

The Town Council Chairman shall have the authority to appoint the investigation team.

The appointment of the investigation team shall be decided by the Town Council Chairman.

The working committee shall comprise of members based on the following factors:

- Able to maintain independence and confidentiality of the investigation
- Subject matter expert of the alleged act committed
- Display high levels of integrity
- Able to be impartial at all times

The size of the working committee shall be up to the discretion of the Town Council Chairman.

The Town Council Chairman shall notify the investigation team in writing to inform them of their role in investigating the allegations made by the whistle-blower.

#### Contents of the investigation report

The content of the investigation report shall be documented by the investigation team and submitted to the Town Council Chairman for review.

The information of the investigation report shall contain

- Details of the incident
- Investigation procedures taken
- Outcome of the investigation and justification

Recommendations to the relevant department to take preventive measures to minimise and/ or prevent future recurrence.



### Confidentiality

A whistle blower's identity will be treated as confidential at all times unless disclosure is required by law.

All documents, files, reports, communications relating to the incident reported by the whistle blower shall be kept confidential and securely stored and retained by the General Manager/Secretary of the Town Council for Situation A and by the Chairman of the Town Council for Situation B.

The management has the discretion to preserve the confidentiality of the outcome of all the cases.

### Protection for Whistle Blower and rights

The Town Council will take all reasonable measures to ensure that a whistle blower who reports an allegation of misconduct in good faith, and any person who participates in the investigation into the alleged misconduct, will be protected from any form of retaliation or retribution by the Management of the Town Council, including but limited to:

- dismissal
- demotion
- any form of harassment
- discrimination, or any bias

The whistle-blower identity shall be kept confidential at all times will be given protection against the alleged party. This includes complaints made in good faith and conclusive investigations that states that no corrective action shall be taken against the alleged.

Any unsubstantiated complaints made by the whistle-blower in good faith shall not be subject to any disciplinary action.

Any malicious, frivolous and vexatious allegation made by the whistle-blower for personal gain shall be subjected to disciplinary or police action.

### False Reporting

Any staff, who intentionally made a false report or making a report other than in good faith, will be considered as misconduct, and may lead to disciplinary action, including termination of employment in serious cases.

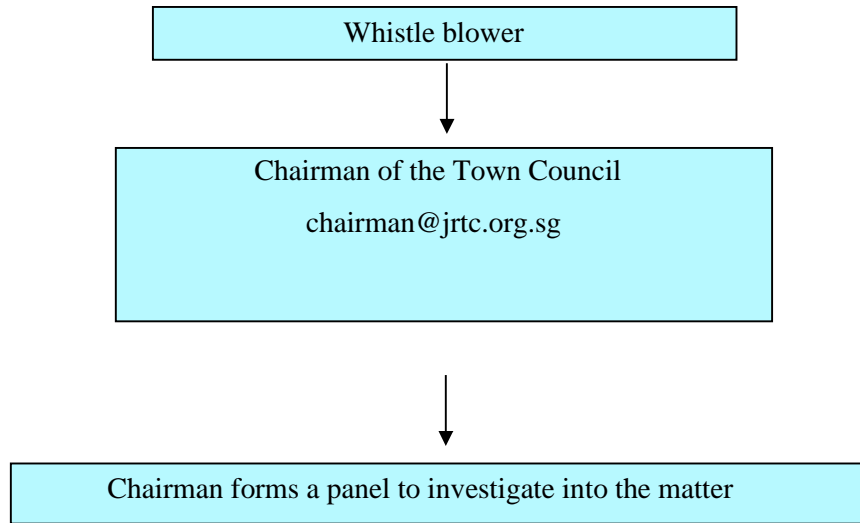
### Record Keeping

The General Manager/Secretary of the Town Council will maintain a record of all cases reported by whistle blowers and the investigation reports for a period of 5 years.



## Whistle Blower

### **Situation A - If the allegation is against the GM of the Town Council or any Town Councillors**



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### **Situation B - If the allegation is against a staff other than the GM of the Town Council**

