

# SINGAPORE WUSHU DRAGON & LION DANCE FEDERATION

## **WHISTLE BLOWING POLICY**

### **1 INTRODUCTION**

- 1.1 The Singapore Wushu Dragon & Lion Dance Federation (“Federation”) and Employees (collectively known as “We”) are expected to carry out their duties as required and conduct themselves in a professional manner at all times and in ways that bring credit to the Federation. We are required to observe high standards of sporting, commercial and personal ethics, honesty and with integrity in fulfilling our responsibilities within all applicable laws and regulations of the Republic of Singapore. Being a public sports organisation, we are socially responsible in ensuring that this is practiced within the Federation, consistent with the Federation’s Constitution and Bye-Laws.
- 1.2 The Whistle Blowing Policy (“Policy”) is intended to help Employees, Management Committee members and all stakeholders of Federation who have major concerns over any wrong doing within the Federation relating to unlawful conduct, financial malpractice or dangers to the public or the environment. Specific examples could include:
- a) A criminal offence (e.g. fraud, corruption or theft) has been/is likely to be committed;
  - b) Fraud whether actual or suspected or deliberate error in preparing, evaluating or review of any financial records of the Federation;
  - c) Actual or suspected deficiencies in or non-compliance with the Federation’s internal controls and procedures;
  - d) Any misrepresentation whether actual or suspected by any employee or Management Committee member or auditor regarding a matter contained or required to be contained in the Federation financial records, reports or audited reports;
  - e) Abuse of authority for personal gain;
  - f) Health and/or safety of any individual has been or is likely to be endangered;
  - g) Discriminating or physical abuse of any employee and/or Management Committee member;
  - h) Discriminating to any employee and/or Management Committee member on grounds of gender, ethnicity, religion or disability;
  - i) Any conflict of interest in any activity that is, or appeared to be, opposed to the common interest of the Federation;
  - j) Information relating to any of the above being deliberately concealed or attempts are being made to conceal the same.
  - k) The Federation has established this Policy so as to enable any employee, Management Committee member or stakeholder to raise their concerns about such malpractice(s) at an early stage and in the right way. The Federation would prefer that all employee/s, Management Committee member/s and/or stakeholder/s raise the matter when it is just a concern rather than wait for concrete proof.

### **2 AIMS OF THE WHISTLE BLOWING POLICY**

- 2.1 The Policy aims to:
- a) Encourage employees, Management Committee members and all other stakeholders to feel confident in raising serious concerns and to question and act upon their concerns.
  - b) Provide ways for employees, Management Committee members and all other stakeholders to raise their concerns and get feedback on any action taken as a result.
  - c) Ensure that employees, Management Committee members and all other stakeholders get a response to their concerns.

d) Reassure employees, Management Committee members and all other stakeholders that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimization, to the extent where the situation allows.

### **3 WHO ARE COVERED BY THE CODE**

3.1 All employees, Management Committee members and all other stakeholders of the Federation may use this Policy.

3.2 Contractors and/or service providers working for the Federation may also use the provisions of this Policy to make the Federation aware of any concerns that the Contractor's employee/s may have with regard to any contractual or other arrangement with the Federation. The private concerns of the Contractor's staff relating to non-Federation business should be raised with the relevant contractor and/or other suitable agency/regulator; including the police, if appropriate.

### **4 WHAT ASSURANCE DO YOU GET?**

4.1 If any employee, stake holder or any Management Committee member does raise a concern under this Code, he/she will not be at risk of losing his/her job or suffering any form of retribution as a result, provided that:

- a) The disclosure is made in good faith.
- b) The employee, stake holder or any Management Committee member reasonably believes that information, and any allegations contained in it, are substantially true.
- c) The employee, stake holder or any Management Committee member is not acting for personal gain.

4.2 The Federation will not tolerate the harassment or victimization of anyone raising a genuine concern. However, the Federation recognises that any employee, Management Committee member or a stakeholder may nonetheless want to raise a concern in confidence under this Policy. For any request of confidentiality by the petitioner, the Federation will not disclose it without getting consent of the petitioner. If the situation arises where the Federation is unable to resolve the concern without revealing the petitioner's identity (for instances because the petitioner's evidence is needed in a court of law), the Federation will discuss with the petitioner whether and how the Federation can proceed.

4.3 While the Federation will consider anonymous reports, this Policy is not well suited to concerns raised anonymously and will not address it accordingly.

### **5 HOW SHOULD A CONCERN BE RAISED?**

#### **5.1 Reporting Allegation**

Information about known or suspected violations by any employee, Management Committee member or any other stakeholder of the Federation should be reported to either the President, Vice Presidents or Secretary-General of the Federation.

5.2 Petitioner should forward the original copy of the signed written complaint letter to the attention of any official mentioned in Section 5.1 at the following address:

Singapore Wushu Dragon & Lion Dance Federation  
50 Serangoon Ave 2 #04-01, Singapore 556129

The petitioner's full name and contact details must be appended in the said letter for communication purposes, where necessary.

5.3 Employee/s Stakeholder/s and Management Committee member/s who wish to make a written report should use the following format:

- a) The background and history of the concern (giving relevant dates).
- b) The reason why he/she/they are particularly concerned about the situation.

## **6 HOW WILL THE FEDERATION RESPOND?**

- 6.1 When a concern is raised, the petitioner must indicate if the concern is to be treated in confidence. The limit of that confidence will be checked out by the President, Vice President/s or Secretary General receiving the information. The respective official receiving the concern will also ensure that the Federation's management receives adequate details of the Petitioner's concerns for the purpose of administrative recording and monitoring purposes.
- 6.2 Once a petitioner has informed the Federation of his/her concern, the Federation will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. The Federation will tell the petitioner who may be handling the matter, how the petitioner can contact him/her and whether the further assistance of the petitioner may be needed.
- 6.3 When the petitioner raises the concern to the Federation, he/she may be asked how he/she thinks the concern(s) might be best resolved. If the petitioner does have any personal interest in the matter, the petitioner should inform the Federation at the outset. Should the petitioner's concern be best handled by another approach such as through the legal channel, the Federation will inform the petitioner.
- 6.4 While the purpose of this Policy is to enable the Federation to investigate possible malpractice and take appropriate steps to deal with it. Please note, however, that the Federation may not be able to the petitioner on the precise action that the Federation will be taking as this could infringe a duty of confidence owed by the Federation to someone else.
- 6.5 Concerns or allegations which fall within the scope of specific procedures will normally be referred for consideration under that relevant procedure. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 6.6 Where appropriate, the matters raised may:
  - a) Be investigated by the Federation's management, internal audit, an investigation committee set up by the Management Committee or through the disciplinary process;
  - b) Be referred to the police;
  - c) Be referred to the external auditor; and/or
  - d) Form the subject of an independent inquiry.

e) Usually, within four weeks of a concern being raised, the person looking into the concern will write to you:

  - f) Acknowledgement that the concern has been received.
  - g) Indicating how the Federation proposes to deal with the matter.
  - h) Subject to any legal constraints, the petitioner will normally be informed of the final outcome of any investigation.

## **7 WHAT SAFEGUARDS ARE THERE FOR THE PETITIONER?**

- 7.1 The Federation will not tolerate any harassment or victimisation (including formal pressures) and will take appropriate action to protect those who raise a concern in good faith.
- 7.2 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures already taking place concerning any employee, Management Committee member or stakeholder of the Federation.
- 7.3 No action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.
- 7.4 Every effort will be made to ensure confidentiality as far as this is reasonably practical.
- 7.5 Help will be provided to all petitioners in order to minimize any difficulties which he/she may experience. This may include advice on giving evidence if needed.

## **8 CONCLUSION**

- 8.1 The Federation is a National Sports organisation that believes in providing an official and trusted channel for our employees, Management Committee members and all other stakeholders to view their concerns. All our employees, Management Committee members and all other stakeholders can make a report via email or in writing to the Federation. Any investigation will be conducted as sensitively and speedily as possible. Every effort will also be made to protect the identity of the stakeholder who gives his/her feedback, comment or complaint.
- 8.2 Notwithstanding Section 8.1, the Federation will not respond to any anonymous email or letter because they can be abused. Anonymous correspondences are sometimes deployed generate harm for personal reasons and often consume much management attention and time to fruitless ending. If anonymous feedback persists on a same matter, the Federation will investigate further. If these are found to be malicious against another employee, Management Committee member or stakeholder, the Federation will not hesitate to take disciplinary action. Without a valid contact access to the petitioner, it might lead to invitations for anonymous griping or, worse still, may lead to a culture of denunciation in the Federation.
- 8.3 In the spirits of sportsmanship, any of our employees, Management Committee members, and/or other stakeholders should first bring the matter to the Federation. If he/she does not wish to discuss the issues openly with the Federation's Management Committee or he/she is not satisfied with the response, he/she can bring the matter to the attention of the Singapore Sports Council.
- 8.4 The Federation expects all its employees, Management Committee members, and all other stakeholders to live the values in ensuring the highest standard of integrity and have the courage to identify themselves when bringing up ideas or issues to the Federation believed to be good for the Federation. The Federation will continue to promote open and transparent communication in a positive sports governing environment to build trust among all our employees, Management Committee members and stakeholders, to focus on making improvements or resolving problems.

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