

## Whistleblowing Policy

### The aims of the Whistleblowing Policy are to:

- a) “Provide an avenue for members, volunteers and employees, to raise and report serious wrongdoing or concerns, particularly in relation to fraud, controls or ethics, without fear of reprisals when done in good faith;
- b) Ensure the independent investigation of the concerns raised; and,
- c) Appropriate actions to be taken.

### The scope of the Policy covers the following general areas:

- a) Financial reporting, accounting or other financial matters;
- b) Corruption, misappropriation or blackmail;
- c) Any criminal offence or failure to comply with a legal or regulatory obligation;
- d) Significant breaches of WMC policies or internal controls;
- e) Work & Safety Breaches
- f) Concealment of any of the above.

### Whistleblowing Reporting & Communication Channels

- a) The individual should report his/her concern to the Chairman LCEC, Pastor-in-Charge and Chairman of Church Governance or to either one of them. They will be responsible to appoint an independent team to investigate the concern. The team appointed will be responsible to ensure that the issues raised are properly resolved and appropriate action taken.
- b) Communication of concern should be via email or written letter to the aforesaid persons. Identity of the person reporting will be kept confidential. Anonymous report will not be entertained or dealt with.
- c) All concerns raised will be independently, fairly and properly assessed by either the aforesaid persons or team appointed by them. Any individual making a whistleblowing report will retain his/her confidentiality unless he/she agrees otherwise. He/she will also be kept informed of who is handling the matter and updated on the progress.
- d) All records will be retained and kept strictly confidential by the Pastor-in-Charge’s office.
- e) WMC will not tolerate harassment, victimization or any form of reprisal of anyone reporting a genuine concern. However, this assurance does not extend to any person who intentionally provides information in a report which they know to be hearsay or reasonably believe to be untrue.

## Process for Lodging of Report

1. A Whistle Blower can lodge a report that should include the following:

A background and history of the concern, giving names, dates and places where possible, setting out the reason why the Whistle-blower is concerned about the situation in writing. This should be made as soon as possible upon observation or discovery.

When raising a concern, it is advisable that the Whistle-blower considers the following in making his/her report:

- a) Disclose the unlawful or unethical practices promptly to avoid any misinterpretation on the motives;
- b) Focus on the issue and avoid unnecessary personal resentment;
- c) Submit an accurate, factual observations and claims and provide as much information as possible;
- d) Avoid any speculation or any prejudicial allegation;
- e) Exercise sound judgment and avoid baseless allegations;
- f) If it is subsequently decided that a statement may be required, the Whistle-blower may be called to give evidence. In these circumstances the Church can only guarantee anonymity to the Whistle-blower for as long as possible provided that it does not impede the conduct of a proper investigation.
- g) Whistle-blower will not be expected to prove the allegation but he/she should be able to demonstrate that there are sufficient grounds to reasonably believe that a misdeed, malpractice or violation has been committed.

In the first instance, the Whistle-blower should submit his/her report to Chairman LCEC, Pastor-in-Charge and Chairman of Church Governance or either one of them. Should the report be on the Pastor-in-charge, the Whistle Blower should submit his/her report to the District Superintendent.

The Recipient of report will write to the Whistle-blower acknowledging receipt of the information and if need be to seek further details and evidence, verify and do a preliminary check.

# Whistle Blowing Process

Process	Documents Required	Description
<pre> graph TD     Start([Start]) --&gt; Step1[1. Whistle Blower raised concern via email or written letter]     Step1 --&gt; Decision{2. Is the report on PIC?}     Decision -- No --&gt; Step2a[2a. Report to be submitted to LCEC Chairman, PIC and CG Chairman or either one of them.]     Decision -- Yes --&gt; Step2b[2b. Report to be submitted to the District Superintendent]     Step2a --&gt; Step3[3. Recipient of report will reply to: a. acknowledge receipt of information and/or b. seek further details and evidence c. verify and do a preliminary check]     Step2b --&gt; Step3     Step3 --&gt; Step4[4. The authorized personnel will appoint an independent team to follow up with the case reported.]     Step4 --&gt; Step5a[5a. The appointed team will perform necessary investigation to ensure issue is properly resolved.]     Step4 --&gt; Step5b[5b. Whistle blower to be kept informed on who is handling the matter and updated on the progress.]     Step5a --&gt; End([End])     Step5b --&gt; End     </pre>	<p><b>To provide below details:</b></p> <ul style="list-style-type: none"> <li>- Name</li> <li>- Contact Number</li> <li>- Date of Event</li> <li>- Place of Event</li> <li>- Description of Concern</li> </ul>	<p>1. When there is a concern in serious wrong doing or situation, particularly in relation to fraud, controls or ethics, the Whistle blower can report via email or written letter to LCEC Chairman, Pastor in Charge, and Church Governance Chairman</p> <p><b>Details of information includes:</b></p> <ul style="list-style-type: none"> <li>- Name, Contact, Date of event, venue, description of concern</li> <li>- Provide accurate and factual observation, and as much info as possible</li> <li>- Avoid any speculation (hearsay) or prejudicial allegation</li> </ul> <p>2. If the report is not on PIC, it should be submitted to LCEC Chairman, PIC and CG Chairman or either one of them. If the report is on PIC, it should be submitted to the District Superintendent.</p> <p>3. Upon receiving the report, the recipient of report will reply to acknowledge and to seek further details/evidence if needed, verify and do a preliminary check.</p> <p>4. The authorized personnel will appoint an independent team to follow up with the case.</p> <p>5. The appointed team shall perform the needed investigation and ensure appropriate actions are taken, and issues are properly resolved.</p> <p>Whistle blower are to be kept informed on who is handling the matter and updated on the progress.</p> <p><b>Note:</b></p> <ul style="list-style-type: none"> <li>- Anonymous report will not be entertained.</li> <li>- All records will be retained and kept strictly confidential by the Pastor-in-Charge's office</li> <li>- WMC will not tolerate harassment, victimization or any form of reprisal of anyone reporting a genuine concern</li> <li>- However, this assurance does not extend to any person who intentionally provides information in a report which is known to be hearsay or reasonably believe to be untrue</li> </ul>