

# **DOWN SYNDROME ASSOCIATION (SINGAPORE)**

## **Whistle Blowing Policy**

## **Introduction**

1. Down Syndrome Association (Singapore) is a non-profit, self-funded voluntary welfare organisation serving the needs of persons with Down syndrome and their families. DSA depends largely on the generosity of the public and corporations for the necessary funds needed to operate its services for children and adults with Down syndrome.
2. This Policy is intended to provide a channel for the reporting of actual or suspected wrong doings committed by our Association's staff and Board members for investigation and corrective action as well as assurance that the Whistleblower will be protected from reprisals for whistleblowing in good faith.

## **Definition**

3. Whistle Blowing is defined as a deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or has had privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing within or by the organisation that is within its ability to control.
4. If an employee, board member has a genuine concern and reasonable grounds to believe that the actions of an employee or board member is in breach or will be in breach of the principles of ethical conduct and fair dealing, he or she can be a whistle blower.
5. Whistle blowing is not a means by which a disgruntled employee or board member can abuse, wreak revenge on or sabotage an employee or board member without any just cause or to hold an employee/board member at ransom. Any action of whistle blowing must be genuine, substantiated with proper evidence, and directed to the Management of DSA within a reasonable time. Where necessary, the whistle blower must be prepared to testify or provide statement of such actions. It should not be by way of anonymous letters, or unfounded or malicious allegations made against an employee or board member.

## **Scope**

6. Any employee, Board members, DSA member, or member of the public who notices or is aware of any wrong doings can lodge a complaint.
7. Wrong doings can be described as, but are not limited to the following:
  - (a) Illegal activities, unethical and improper practices relating to financial and accounting matters and standards, which may include falsification, forgery, or fraudulent alteration of documents (cheques, bank drafts, contractual agreements, purchase orders, invoices, etc.) or data such as financial, operational and computer data and submission of fictitious documents.

- (b) Misappropriations/improprieties in the handling of funds, securities (investments in bonds, stock & shares, and deposits, etc), supplies, or any other assets.
- (c) Questionable accounting practices
- (d) Corruption and bribery
- (e) Theft and other dishonest acts

### **Procedures in lodging a complaint**

8. On receipt of a written complaint, the Executive Director must pass this information as soon as is reasonably possible to the DSA Chairperson and Deputy Chairperson who will review the complaint and may authorize an investigation to be conducted by the Executive Director, and/or other Board members.
9. The DSA Chairperson and Deputy Chairperson has the right to refer the complaint back to the Executive Director if he/she feels that the Executive Director without any conflict of interest can more appropriately investigate the complaint.
10. In the case of a complaint, which is in any way connected with the Executive Director, Chairperson and/or Deputy Chairperson, the Administrative Committee Board members will either take over or assign other Board members without any conflict of interest or approach external independent parties to act as the investigating officers.
11. The individual making a complaint should ensure that all claims of wrongdoings are made in good faith. When making a report, he/she should provide as much details as possible in relation to:
  - (a) What is the alleged act?
  - (b) Who is involved in the act?
  - (c) When and where did it occur?
  - (d) What are the supporting documents and evidence?
12. The individual lodging a complaint is encouraged to identify himself/herself and provide his/her contact details.
13. Concerns raised anonymously are much less persuasive and may hinder investigation work as it is difficult to investigate the matter or to protect the individual's position.
14. The individual, whether an external party, employee, or Board member, makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her.

15. The identity and the concerns or irregularities raised by the individual making the complaint will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the investigation process.
16. In the event if he or she has made an allegation frivolously, maliciously, or for personal gain, appropriate or disciplinary action may be taken against him or her including reporting the matter to the police.
17. The findings of the investigation will be brought up to the DSA Board of Management. The findings will also be disclosed to the DSA Audit Committee.
18. The DSA Board of Management will then decide on whether to disclose the findings of the investigation to the individual making the complaint, and/or to other parties concerned.

Dated this October 2016