



# WHISTLEBLOWING POLICY



**Launched 1.0** Oct 2011 (Updated Sep 2012, July 2013, Oct 2013, Nov 2013, March 2014, Oct 2015, Nov 2015) | **Revised Edition 2.0** April 2016 (Updated June 2018) | **Revised Edition 3.0** Nov 2019

© ALL RIGHTS RESERVED

# Introduction

## 1. Purpose of Policies

### 1.1 Culture and Core Values Articulated : Know why we do it

As a church, we want to reflect our culture and core values in the way we relate to people, approach situations, and deal with problems that arise in our church life. These policies will help to articulate in a clearer and more systematic way what our culture and core values are. In other words, this sets out why we do what we do.

### 1.2 Consistency Assured : Know what to do and how to do it

As the church grows and the leadership expands, it is important to ensure that there is still a consistent approach to situations and circumstances. Policies take personalities out of the picture so decisions are based on policies and not on the individual. Each situation will be dealt with thoughtfully and purposefully, reducing the possibility of problems arising due to inconsistency. Best practices are also developed as we strive towards our vision of becoming a world-class church in a first-world nation. As these policies will form the platform for training, this also ensures leaders and volunteers, especially newly appointed ones are sufficiently equipped to handle their responsibilities and they will now know how and what to do in the various situations they may encounter in their jobs and ministries.

### 1.3 Covering and Accountability : Protect what we do

Policies provide a layer of covering for the members of our church congregation as the systems set up provides a safe and secure environment for all, especially the youth and children.

In addition, it assures the public and authorities that there are clearly stated systems and processes in place in our organization. With authorities defined, boundaries set, and responsibilities delegated, it is known to all who does the task, why it is done, and under what conditions it is done and helps to ensure the accountability of all involved. It also prepares the church to respond to emergencies swiftly and appropriately.

These policies also enable us to keep a lookout for each other so that if we observe behaviour that does not comply with the standards set, we know how we should respond and who we should inform.

Furthermore, it will minimise the likelihood that the church and those who work and volunteer in it could be subject to unwarranted accusation and suspicion. Basically, complying with these policies will go a long way to protecting what we do in church.

2. Disclaimer

It is impossible to provide by policy for every conceivable situation or circumstance that might possibly arise. It may be necessary to modify or depart from this policy in certain cases based on unique facts and circumstances, and Heart of God Church reserves the right to do so at its discretion.

3. Modification

These policies may be modified or withdrawn by Heart of God Church Board of Directors and the Senior Leaders respectively anytime. These policies are not intended to create an implied or express contract with any person. They are not intended to create a legally enforceable or binding promise or representation.

4. Feedback

If there are any questions, feedback or suggestions for improvement, please contact us at [policies@heartofgodchurch.org](mailto:policies@heartofgodchurch.org).

## **Whistleblowing Policy**

### **1. Our Commitment**

We are committed to strong corporate governance and lawful and ethical behaviour in all our activities. We aim to promote a culture of openness, accountability and integrity and do not tolerate any misconduct, impropriety, illegal practices or wrongdoing by staff, leaders and volunteers in the course of their work and ministry.

### **2. Aim of Policy**

The Policy aims to create an environment where staff, congregation, vendors and service providers and members of the public can be assured that they are able to raise concerns in good faith on misconduct, impropriety, illegal practices or wrongdoing without fear of reprisal and/or victimisation and with an assurance that their concerns will be taken seriously and investigated.

### **3. Whistleblower**

3.1 A whistleblower is an individual who in good faith reports an incident of misconduct, impropriety, illegal practice or wrongdoing within, by or under the control of the HOGC Group. The whistleblower's role is to report, and not to investigate the facts. The whistleblower does not direct the investigation or determine the action that is to be taken.

3.2 All staff, congregation, vendors and service providers as well as members of the public can whistleblow.

### **4. Matters that can be reported in Whistleblowing**

4.1 These are the matters that can be reported in whistleblowing:

- a. Criminal and Illegal activities
- b. Financial or non-financial malpractices or impropriety (such as corruption, bribery, embezzlement, misappropriation, money laundering, forgery, cheating, theft, criminal use of monies and resources belonging to the HOGC Group )
- c. Sexual misconduct (such as outrage of modesty, taking upskirt video, inappropriate sexual behavior, sexual abuse)
- d. Abuse of power and authority (such as bullying, retaliation, harassment)
- e. Personal and/or professional misconduct
- f. Endangerment of health or safety of employees, congregation (especially the young and elderly), service providers and stakeholders
- g. Damage to church premises, property and reputation

4.2 In order to facilitate any subsequent action or investigation, the whistleblower should provide as much information as possible such as:

- a. names of parties involved
- b. places
- c. dates
- d. times
- e. description of alleged wrongdoings
- f. money or assets involved
- g. how often the incident has happened
- h. all other relevant evidence that will assist investigation e.g. pictures, documents, emails, SMS etc.

4.3 This Whistleblowing channel is NOT for:

- a. general complaints or grievances over service quality of operational or ministry matters
- b. unhappiness with the private conduct of fellow congregation members
- c. doctrinal or theological discussions

Such concerns should be taken up with ministry leaders and pastors.

#### 5. Confidentiality of the Whistleblower

The whistleblower is encouraged to identify himself/herself in order to facilitate investigation. Reports made anonymously are more difficult to act upon effectively but they will be considered, taking into account the following:

- a. Seriousness of issues raised;
- b. Significance and credibility of concerns;
- c. Likelihood of confirming the allegation from attributable sources and information provided.

#### 6. Protection of the Whistleblower

6.1 The whistleblower can be assured that all concerns raised will be acknowledged and treated with the strictest confidence throughout the process, consistent with the need to conduct an adequate investigation.

6.2 Exceptions to the above include:

- a. When HOGC Group is under legal obligation to disclose such information provided;
- b. When the information is already in the public domain;
- c. When the information is given in strict confidence to legal or auditing professionals for the purpose of obtaining professional advice; and
- d. When the information is given to the Police for criminal investigation.

- 6.3 HOGC prohibits reprisal of any kind such as employment termination, discrimination, retaliation or harassment against a whistleblower who reports an incident in good faith without malice or consideration of personal benefit. Although the whistleblower is not expected to prove the truth of an allegation, he or she needs to demonstrate that there is a reasonable basis for the concern. HOGC shall not condone any frivolous, mischievous or malicious allegations. Employees found making such allegations shall be subject to disciplinary action accordingly.

## 7. Whistleblowing Investigation Process

- 7.1 The whistleblowing Investigation Team, led by independent board members and leaders and members who are non-staff will:
- a. Receive, handle and investigate whistleblowing reports
  - b. Determine responses and actions including who will be kept informed and/or enlisted to assist in investigation
  - c. Decide whether to seek advice from legal or audit professionals or to report to the police or any other external regulatory authorities
  - d. Report the findings to the Board of Directors
- 7.2 To ensure accountability, the Whistleblowing Investigation Team will be separately audited by another independent team to ensure checks and balances as well as accountability.

## 8. Method for Whistleblowing

Whistleblowing reports can be made by calling this number +65 6871 8933.