

Fairfield Methodist Church (Singapore)

Whistleblowing Policy

1. Purpose

- 1.1 Fairfield Methodist Church (Singapore) ("**the Church**") is committed to integrity, accountability and good governance in its ministries and operations.
- 1.2 This Whistleblowing Policy ("**Policy**") provides a confidential avenue for staff, pastors, members, volunteers, vendors and other stakeholders to raise concerns, in good faith, about suspected serious wrongdoing relating to the Church.
- 1.3 The purposes of this Policy are to:
 - a. provide a safe and credible avenue for concerned persons to report serious wrongdoing;
 - b. ensure such reports are assessed and, where appropriate, investigated;
 - c. protect persons who report concerns in good faith from fear of reprisal, unfair treatment or retaliation; and
 - d. support the Church's commitment to lawful, ethical and responsible conduct.

2. What this Policy Covers

- 2.1 This Policy applies to the Church and its related parties, including its leaders, staff, ministry workers, volunteers, members, or vendors engaged by the Church.
- 2.2 This Policy covers **suspected serious wrongdoing** relating to the Church. For the purposes of this Policy, serious wrongdoing includes matters such as:
 - a. **financial impropriety**, including fraud, theft, misappropriation of funds or assets, falsification of records, or serious accounting irregularities;
 - b. **bribery, corruption or improper personal benefit**, including undisclosed conflicts of interest or misuse of position for personal gain;
 - c. **unlawful conduct** or serious breach of applicable laws or regulations;
 - d. **serious breach of the Church's governance processes, internal controls, policies or procedures**, where the matter is significant in nature or impact;
 - e. **abuse of power or authority**, including serious harassment, intimidation, victimisation or retaliation;
 - f. **serious unethical or immoral conduct** that may expose persons to harm or expose the Church to significant legal, financial, operational or reputational risk;
 - g. **deliberate concealment** of any of the matters above, or deliberate failure to report known serious wrongdoing.

- 2.3 The examples in paragraph 2.2 are not exhaustive. The key question is whether the concern relates to **serious wrongdoing that ought to be independently reviewed**, rather than an ordinary complaint or disagreement.

3. What this Policy Does Not Cover

- 3.1 This Policy is **not** intended for ordinary complaints, personal grievances or routine operational matters that can reasonably be addressed through normal pastoral, supervisory, ministry or administrative channels.

- 3.2 Matters generally not covered under this Policy include:

- a. interpersonal disagreements or relationship issues;
- b. dissatisfaction with ministry style, pastoral decisions, service quality or operational arrangements;
- c. routine employment or volunteer-management matters such as workload, postings, appraisals, leave, performance feedback or supervisory decisions; and
- d. concerns about private conduct that do not involve the Church, do not amount to serious wrongdoing, and do not create a significant safeguarding, legal or governance concern.

Such matters should be raised through the appropriate Church channels, including pastors, ministry leaders, PPRSC, HR or other relevant committees.

- 3.3 If there is uncertainty about whether a matter falls within this Policy, the Governance Chairperson, in consultation with the Governance Committee, may determine the appropriate channel for handling it.

4. Good Faith and Protection from Retaliation

- 4.1 A person making a report under this Policy must do so **in good faith** and with an honest belief that the concern raised may be true, whether or not it is ultimately substantiated.
- 4.2 No person who raises a concern in good faith under this Policy should be subject to retaliation, harassment, victimisation, discrimination or other detrimental treatment for doing so.
- 4.3 Protection under this Policy does not extend to reports made maliciously, frivolously, vexatiously, or with knowledge that the allegation is false. Such conduct may result in appropriate follow-up action by the Church.

5. Confidentiality

- 5.1 Subject to paras 5.2 and 5.3 below, the Church will treat the identity of the whistleblower and all whistleblowing reports as confidential.

- 5.2 The identity of the whistleblower and details of the report will be disclosed only in exceptional circumstances which include:
- a. where the Church is under a legal obligation to disclose the information provided;
 - b. where the information is already in the public domain;
 - c. where the information is given on a strictly confidential basis to legal or any professionals for the purpose of obtaining professional advice; or
 - d. where the information is given to the police or other statutory authorities for criminal investigation.
- 5.3 In the event that the Church is faced with a circumstance not listed above, where the disclosure of the whistleblower's identity is deemed necessary, the Chairperson of the Governance Committee (or any other member of the Governance Committee) will endeavour to discuss the said disclosure with the whistleblower first.
- 5.4 A whistleblower should keep the reported matter confidential and avoid discussing it with other persons except where necessary by law or for the purpose of obtaining independent legal advice.

6. How to Make a Report

- 6.1 A report should be made in writing and marked **"Private & Confidential – Whistleblowing Report"**.
- 6.2 Reports may be submitted through the following channels:

By Post

Chairperson, Governance Committee
and Chairperson, Local Church Executive Committee
Fairfield Methodist Church
1 Tanjong Pagar Road
Singapore 088437

By Email

Chairperson, Governance Committee: Governance-Chair@fairfieldmc.org
Chairperson, Local Church Executive Committee: LCEC-Chair@fairfieldmc.org

7. Information to Include in a Report

- 7.1 To enable proper assessment, a whistleblowing report should include, where available:
- a. the name and contact details of the whistleblower;
 - b. the name, role or identity of the person(s) involved;
 - c. the whistleblower's relationship to the matter;

- d. a clear description of the concern, including what happened;
 - e. when and where the matter occurred;
 - f. how the matter came to the whistleblower's attention;
 - g. any supporting evidence or information, including documents, emails, messages, records, photographs or witness details; and
 - h. whether the matter has already been raised with any pastor, leader, staff member or committee, and if so, with whom and when.
- 7.2 The Church encourages whistleblowers to provide their name and contact details so that follow-up questions may be asked where necessary. Anonymous reports may be considered, but the Church's ability to assess or investigate them may be limited if the Church is unable to obtain the relevant follow-up information to investigate further into the concerns. Where the identity of an anonymous whistleblower is subsequently discovered or disclosed, that person shall be entitled to the same protections under this Policy as a named whistleblower.
- 7.3 The whistleblower may be asked to clarify facts, provide further information, and cooperate reasonably with any review or investigation.

8. Assessment and Investigation

- 8.1 All reports received under this Policy will be reviewed by the **Governance Committee**, or by persons appointed to handle whistleblowing reports.
- 8.2 The Governance Committee may:
- a. acknowledge receipt where contact details are provided;
 - b. conduct a preliminary assessment of the concern(s) raised in the report;
 - c. determine whether the matter falls within this Policy;
 - d. decide whether an investigation is warranted and what form it should take; and
 - e. appoint an internal or external person or team to investigate where appropriate.
- 8.3 Any person who is the subject of the report, or who may have a conflict of interest, must not be involved in deciding how the matter is handled.
- 8.4 Where a member of the Governance Committee is the subject of a report, or has a conflict of interest in relation to it, that member must recuse himself or herself entirely. If the report concerns the Chairperson of the Governance Committee, or if a majority of the Governance Committee is conflicted, the matter shall be referred to and handled solely by the Chairperson of the LCEC, who may appoint an independent external party to conduct any investigation.
- 8.5 An investigation may include review of documents, interviews, consultation with professional advisers, and referral to appropriate authorities where necessary.

- 8.6 The findings of any investigation, together with any recommended actions, will be reported to the **Local Church Executive Committee (“LCEC”)** for follow-up.
- 8.7 Where there is reason to suspect criminal conduct or other reportable misconduct, the Church may refer the matter to the relevant authorities.

9. Outcome and Follow-Up

- 9.1 Where appropriate and practicable, and subject to confidentiality and privacy considerations, the whistleblower may be informed that:
- a. the report has been received;
 - b. the matter has been reviewed or investigated; and
 - c. appropriate action has been taken or will be considered.
- 9.2 The Church is not obliged to disclose full details of any investigation, findings or disciplinary action.
- 9.3 Follow-up action may include changes to internal controls, policy revisions, pastoral or managerial intervention, training, disciplinary processes, or referral to external authorities.

10. Policy Misuse

- 10.1 This Policy must not be used to make allegations that are knowingly false, malicious, frivolous or vexatious.
- 10.2 Where a report is found to have been made in bad faith, the Church may take appropriate action in accordance with its governance and disciplinary processes.