

## WHISTLE BLOWING POLICY

### POLICY DETAILS

1. Policy Objectives and Scope. KIN is committed to a high standard of high transparency, integrity, compliance, and accountability. This policy aims to provide a formal, safe and confidential means through which employees, volunteers, or members of the public could, in good faith, report any misconduct or malpractice that have an adverse impact on KIN, so that the organisation may take any relevant action.

2. Policy Coverage. This policy covers serious concerns that could have a significant impact on KIN, including:

- a. Fraudulent activity;
- b. Incorrect financial reporting;
- c. Unlawful activities;
- d. Misconduct or unethical conduct, especially such behaviour towards people with disability.

3. Confidentiality. KIN is committed to protect any person who reports in good faith. Disciplinary actions will also be taken against those who intimidate, retaliate, discriminate or impose adverse employment consequences on the whistle blower. In the spirit of confidentiality, KIN allows anonymous reporting. However, if necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, KIN shall seek the whistle-blower's consent. The Audit Subcommittee shall not only ensure proper confidentiality safeguards of the filed report, it shall also maintain the confidentiality of those involved in the case to the extent possible to meet the needs of the investigation.

4. Roles and Responsibilities. The Management Committee and Audit Subcommittee oversee whistleblowing practices in KIN. Where appropriate, they may be assisted by a designated staff member to ensure that procedures are carried out in accordance with this policy, and that the policy is operating effectively.

5. Reporting Channels. If employees, volunteers, or members of the public have cause to suspect serious concerns, a report should be made using the form provided in Annex A. However, where filling up the report in Annex A is not possible (esp. for persons with disability), alternative modes of reporting will be arranged. All reports received will be channelled to the President of the Management Committee and to members of the Audit Subcommittee. All reports or requests for alternative modes of reporting should be sent by e-mail to [president@kin.org.sg](mailto:president@kin.org.sg). Alternatively, the report may be lodged directly with members of the Audit Subcommittee.

6. Assessment of Concerns. Assessment of the concern is based on the nature and severity of the concern raised and the credibility of the information, including the sources. The Audit Subcommittee (or a designated staff member) shall decide whether an investigation is required to examine the issue raised. For a serious concern (e.g. alleged criminal offence), the matter will be reported to an external agency following prevailing laws and regulations.

7. Investigation. The Audit Subcommittee or the Management Committee will set up an

investigation team, comprising at least three independent members (i.e. those who are not connected to the concern reported). Where appropriate, external advice may also be sought to assist in the investigation process. The investigation process establishes the investigation objective, gathers evidence, reports on the findings and provides recommendations. On receiving the investigation report, the Management Committee or Audit Subcommittee shall decide on the severity and authenticity of the concern, and the next course of action. The whistle-blower will be kept informed of the progress of the investigation, and if appropriate, of the final outcome. When the whistle-blower is not satisfied with the outcome of the investigation, he/she can raise the matter with adequate explanation to the Audit Subcommittee (or designated staff member), upon which KIN will examine the concern if there are reasonable grounds. To ensure proper closure of the case, there shall be a review of the investigation report and follow-up by the Audit Subcommittee (or designated staff member), with support provided by the Management Committee.

8. Documentation. All assessment of concerns, investigation reports and decisions made by the Management Committee or Audit Subcommittee and its outcomes shall be minuted and filed.

**ANNEX A  
WHISTLE-BLOWER REPORT FORM**

<p><b>WHISTLE-BLOWER'S DETAILS</b> (This section may be left blank if the whistle-blower wishes to remain anonymous.)</p>
Name:
Designation:
Department/Charity:
Contact Number:
Email Address:
Can you be contacted for more information?: Yes / No (please delete as required)
<p><b>ALLEGED PARTY'S / PARTIES' DETAILS</b> (Name, Designation, Department)</p>
<p><b>WITNESS/ES' DETAILS (IF ANY)</b> (Name, Designation, Department, Contact Number, Email Address; Can the witness/es be contacted for more information?)</p>
<p><b>CONCERN</b> Describe the alleged misconduct and how you have come to know about it</p>
1. What misconduct happened?
2. Who committed the misconduct?
3. When did it happen and when did you notice it?
4. Where did it happen?
5. Have you approached the alleged person? If yes, what did they say?

6. Is there any evidence of the misconduct that you can provide?		
7. Were there other people involved? If yes, who are they?		
8. Do you have any other details or information which would assist us in the investigation?		
9. Have you reported the incident internally or through any other channels? If yes, to whom have you made the report?		
<b>DATE / SIGNATURE</b>		
Name	Signature	Date

Please email the completed form to [president@kin.org.sg](mailto:president@kin.org.sg).