

 <p>Singapore Swimming Association</p>	Document:	
	SSA Whistle-blowing Policy (2018)	
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Updated by: Donald Lee Date: July 2018	Review and Approved by: Executive Committee Date of Approval: Sept 2018	

1. Introduction

- 1.1 In an effort to strengthen corporate governance processes and practices, Singapore Swimming Association (SSA) has adopted a Whistle-blowing Policy to provide a platform for Representatives to raise genuine concerns on possible improprieties in the conduct of its operations.

2. Purpose

- 2.1 SSA is a not-for-profit association that relies largely on government funding and support from other agencies and stakeholders to achieve its goals. As such, the Association has an added responsibility of ensuring that all Representatives uphold a high standard of integrity and professionalism to maintain the trust and confidence of all stakeholders. Thus, the Association is committed to utilise its resources responsibly by maintaining an ethical culture, one of integrity and compliance with laws and regulations.
- 2.2 In line with the above commitment, this Policy is intended to provide a channel for the reporting of genuine actual or suspected wrong-doings committed by any Representative of the Association for investigation and corrective action as well as assurances that the whistle-blower will be protected from reprisals for whistleblowing in good faith.

3. Terms and Definitions.

- 3.1 “Association” refers to the Singapore Swimming Association or SSA.
- 3.2 “Representative” refers to Executive Committee Members, staff, volunteers and all individuals representing or acting on behalf of the Association.
- 3.3 “Policy” refers to this Whistle-blowing Policy.
- 3.4 “Investigating Officer” refers to either one of the three persons, designated under Section 6.1, to whom a complaint has been lodged to.
- 3.5 “ACC” refers to the Audit and Compliance Committee
- 3.6 “COI” refers to the Committee of Inquiry

4. Scope

- 4.1 Any Representative of the Association or the general public who notices or is aware of any wrong-doings may lodge a report.
- 4.2 Possible wrong-doings or improprieties include, but are not limited to:

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- a) Fraud
Relates to the wrongful or criminal deception intended to result in financial or personal gain. This includes the misappropriation of the Association's assets.
- b) Corrupt Conduct
This can take many forms including theft, embezzlement, misuse of information and bribery, dishonest performance of roles and responsibilities and intentional non-disclosure of conflicts of interest.
- c) Questionable Accounting Practices
This refers to practices that do not comply with accounting or auditing standards, or falsification, forgery or fraudulent alteration of documents.
- d) Adverse Behaviour
This can involve illegal behaviour, including drug sale or use and illegal money-lending activities, violence or threatened violence, criminal damage against property and serious breaches against SSA's code of conduct such as sexual harassment and discrimination.

5. How and What to Report

- 5.1 The whistle-blower shall ensure that all claims of wrong-doings or improprieties are made in good faith. The earlier a concern is expressed, the easier it is to take action to address the issue raised. To ensure the factual accuracy of all complaints and take measures to mitigate or remedy them, all complaints should be made as soon as possible.
- 5.2 To enable SSA to effectively investigate claims, the following information should be provided, where possible:
 - (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?
 - (e) Any other information that may substantiate the claim.
- 5.3 The whistle-blower is encouraged to identify himself/herself to the Investigating Officer and provide his/her contact details in case further information or clarification is needed. To the extent feasible and permissible under the law, the Investigating Officer will make every effort not to reveal the identity of the whistle-blower. Whistle-blowers who report serious misconduct in good faith will be protected from unfair treatment and adverse consequences such as termination of employment, harassment or discrimination.
- 5.4 After lodging a complaint, the whistle-blower should refrain from further investigation of the incident, confrontation of the accused or further discussion of the incident. If he or she has identified himself/herself, he or she may be contacted by the investigating officer to provide additional information or clarification, where appropriate.

6. Whistle-blowing Reporting Channels

6.1 The available channels for whistle-blowing are as follows:

Investigating Officers: Level 1			
Name:	Edwin Ker	Name:	Leon Lim
Position:	Executive Director	Position:	Director of Finance, Admin & Business Development
Email:	Edwin.ker@swimming.org.sg	Email:	Leon.lim@swimming.org.sg
Contact Number:	+65 9237 1638	Contact Number:	+65 9764 8408
Investigating Officers: Level 2			
Name:	Lee Kok Choy	Name:	Bervyn Lee
Position:	President	Position:	Secretary General
Email:	Kokchoy.lee@swimming.org.sg	Email:	Bervyn.lee@swimming.org.sg
Contact Number:	+65 9638 6906	Contact Number:	+65 9645 6874
Investigating Officers: Level 3			
Name:	Dominic Soh	Name:	
Position:	Chairman, Audit & Compliance Committee	Position:	
Email:	dominic.soh@swimming.org.sg	Email:	
Contact Number:	+65 9010 5889	Contact Number:	

6.2 Whistle-blowers may use any of the available communication channels mentioned in the above section to report their concerns. Please refer to Annex A for flowchart on the reporting channels for whistle-blowing.

7. Response by Investigating Officer

7.1 All reports received will be treated in the strictest confidence. If the whistle-blower provides his/her identity, the identity shall be made known only to the Investigating Officer.

7.2 After receiving the complaint, a preliminary assessment will be conducted based on the information provided. If there is a prima facie case, a thorough investigation will be carried out and a Committee of Inquiry may be convened. If there is no prima facie case, the Investigating Officer shall inform the Audit & Compliance Committee of the complaint and obtain their agreement for no further investigations to be carried out.

7.3 There may be circumstances where there is insufficient evidence to proceed, particularly in situations of anonymous reporting. Allegations raised anonymously may be investigated depending on the seriousness of the issues raised, the credibility of the concern, and the likelihood of confirming the allegations from attributable sources.

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8. Duties of Investigating Officer / Committee of Inquiry

8.1 It is the duty of the Investigating Officer / Committee of Inquiry:

- a) To make all reasonable efforts not to disclose the identity of the whistle-blower, including to the Audit and Compliance Committee or President/Secretary General during presentation of the case facts.
- b) To ensure that all members of the Audit and Compliance Committee or President/Secretary General is free from any real, perceived or potential conflicts of interest or bias in relation to the case.
- c) To ensure that any Audit and Compliance Committee member or President/Secretary General who is identified to have a conflict of interest or bias relating to the case, as stated in Section 8.1(b), is refrained from any decision-making powers conferred in Section 9.1.1 and 9.1.2 below.
- d) To provide a response to the whistle-blower (if identity is known) on how the complaint would be dealt with and an estimated turn-around time for a final response.

8.2 The Investigating Officer / Committee of Inquiry shall provide regular updates to the Audit & Compliance Committee about the case to ensure that issues reported are being follow up on.

9. Outcome of Investigation

9.1 After an investigation has been carried out, the Investigating Officer / Committee of Inquiry shall present the findings to the Audit and Compliance Committee, and:

9.1.1 In situations where there is insufficient evidence to proceed, the Investigating Officer shall state the reasons why no further investigation will occur. The Audit and Compliance Committee shall approve the complaint to be discharged or shall instruct the Investigating Officer to carry out further investigation.

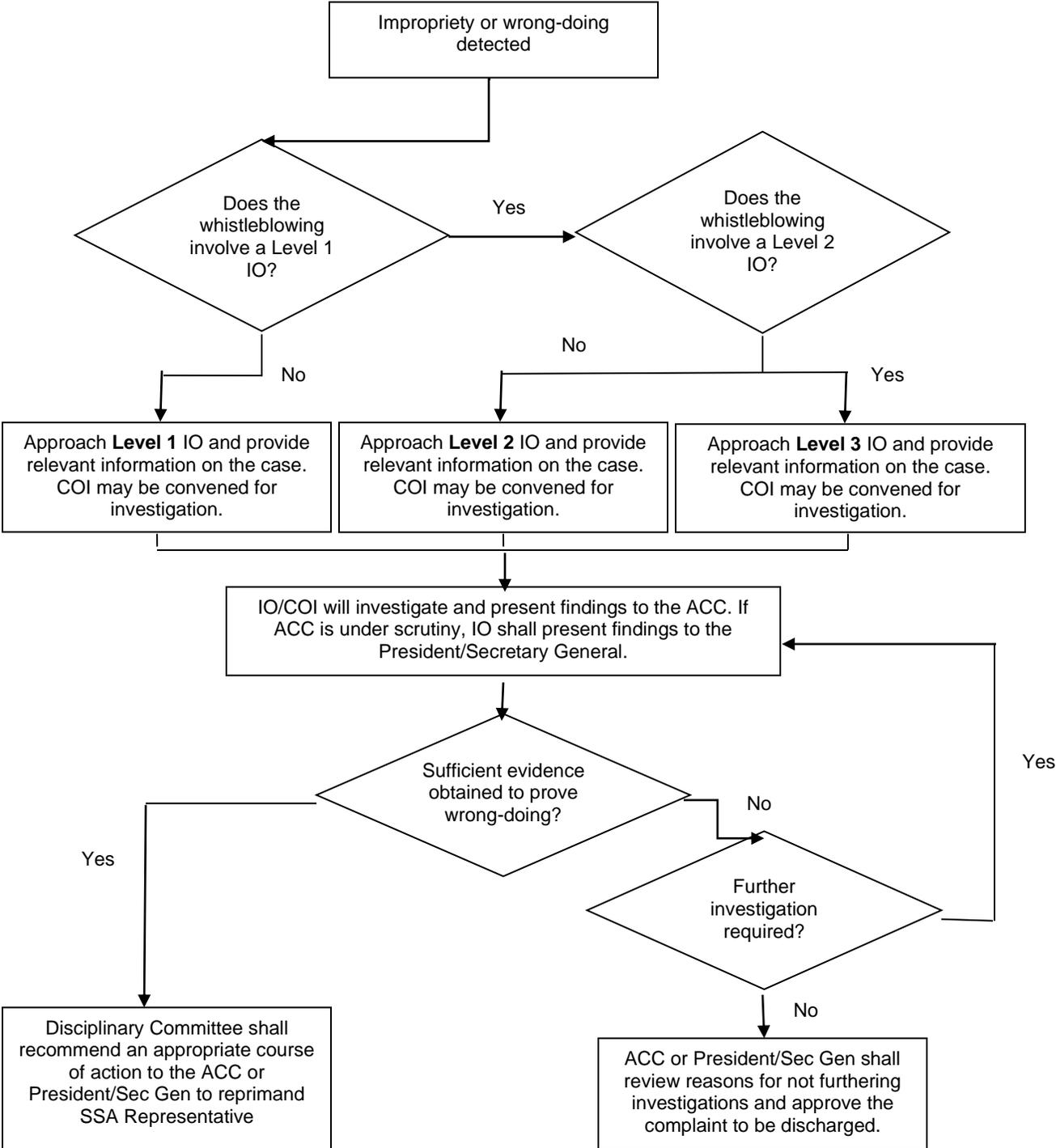
9.1.2 Where sufficient evidence has been obtained to prove the wrong-doing or impropriety of a SSA Representative, the Audit and Compliance Committee shall approve an appropriate course of action to reprimand or penalise the SSA Representative.

9.2 In circumstances where an Audit and Compliance Committee Member is the individual under scrutiny, the Investigating Officer shall present the findings to the President and Secretary General, and they shall make the appropriate decisions as stated in Section 9.1.1 and 9.1.2 above.

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Annex A

Whistle-blowing Flowchart



IO/COI= Investigating Officer / Committee of Inquiry
 ACC = Audit & Compliance Committee
 DC = Disciplinary Committee