



THE BOYS' BRIGADE

WHISTLEBLOWING POLICY

Prepared by Mr Desmond Koh, Executive Director

First Version Approved by Brigade Executive on 18 March 2018

Revised at Brigade Executive Meeting 05/2025 – 15 September 2025

1. Introduction

- 1.1 The Boys' Brigade (BB) in Singapore is a uniformed youth organization that is recognized as a Co-Curricular Activity (CCA) in schools. It is also an institution of public character. The Boys' Brigade would ensure that any person related to the BB has the responsibility of upholding a high standard of integrity to maintain the trust and confidence the public has placed on us. The BB is committed to stewarding our resources responsibly by maintaining a culture of integrity and compliance with laws, regulations and standards.
- 1.2 In line with the above commitment, this Policy provides a safe, accessible and trusted channel for staff, volunteers, vendors, partners, and members of the public to report concerns about suspected wrongdoing, misconduct, risk to people, funds, or reputation — without fear of retaliation.

2. Scope

- 2.1 Any employee, contract staff, volunteer, vendor, contractor, person related to the BB or member of the public who notices or is aware of any wrongdoings can lodge a report.
- 2.2 Concerns may include, but are not limited to the following:
 - a) Fraud, corruption, bribery
 - b) Safeguarding & child/youth protection breaches (physical, emotional, sexual abuse, neglect)
 - c) Bullying, harassment, discrimination
 - d) Breach of laws or regulations (including PDPA/data protection, workplace safety)
 - e) Misuse of authority or resources
 - f) Conflict of interest, procurement irregularities, nepotism
 - g) Retaliation against whistleblowers
 - h) Other serious improper conduct that may cause harm to people, property, funds, or reputation.

3. Whistleblowing Reporting Channels

3.1 Reports can be made through the following channels:

Report To	Channels
Audit Committee Chairman	Dedicated - Email: acchair@bb.org.sg - Postal address: The Boys' Brigade in Singapore 10 Kwong Avenue Singapore 348884 (Marked "Confidential", Attention to Audit Committee Chairman and sealed in an envelope)
Brigade President	- Should the report relate to the Audit Committee Chairman or Member, please direct it to the Brigade President at brigadepresident@bb.org.sg - Postal address: The Boys' Brigade in Singapore 10 Kwong Avenue Singapore 348884 (Marked "Confidential", Attention to Brigade President and sealed in an envelope)

4. How to Make a Report

4.1 When making a report, the whistle blower should provide as much detail as possible (See Form attached). This helps with the assessment and investigation promptly. Proof is not needed, but the more facts shared, the better the Brigade can act. These include:

- Your relationship to the organisation** (staff, volunteer, vendor, member of public, etc.)
- Description of the concern** — what happened, when, where, who was involved.
- Any evidence you have** (documents, screenshots, photos, emails, witness names).
- Whether you are willing to be contacted** for clarification or updates.
- Any immediate risk** to people, property, funds, or reputation.

4.2 The whistleblower may choose to identify himself/herself or remain anonymous when making a report. We encourage whistleblowers to provide their name and contact

information, as this often allows for quicker clarification and a more thorough investigation. However, we recognize that in some situations, anonymity may help a person feel safer to come forward. Anonymous reports will be accepted and acted upon to the extent the information provided can be verified. Please note that, without a way of contacting you, our ability to gather additional facts or evidence may be limited — but every effort will be made to assess and address the concern raised.

5. Handling & Investigation Process

Step 1 – Intake & Acknowledgement

- All reports are logged by the AC Chair or delegated independent officer.
- Acknowledgement sent within 5 working days (unless report is anonymous).

Step 2 – Triage & Conflict Check

- Conflict-of-interest check performed. If AC Chair is implicated, report goes to President; if both are implicated, an independent Board member or external ombud is appointed.

Step 3 – Preliminary Assessment

- Assess seriousness, credibility, and scope; decide investigation approach.

Step 4 – Investigation

- Assigned to an internal investigation team or external independent investigator (for sensitive/high-level cases).
- Evidence handled securely; witness confidentiality preserved.

Step 5 – Findings & Actions

- Investigation report to AC, with recommendations for actions or referrals to regulators/law enforcement.

Step 6 – Closure & Feedback

- Outcome communicated to whistleblower (if contactable), subject to legal/privacy limits.
- Target closure: within 90 days of acknowledgement (complex cases may need more time, with updates every 30 days).

6. Escalation to Regulators / Authorities

6.1 Matters involving suspected criminal conduct, serious safeguarding breaches, or other regulatory non-compliance will be reported promptly to:

- Commissioner of Charities
- Police / law enforcement
- Relevant regulatory body (e.g., PDPC for data breaches)

7. Protection & Non-Retaliation

- 7.1 The Brigade will not tolerate retaliation against any whistleblower who reports in good faith. Retaliation includes dismissal, demotion, harassment, exclusion, or other adverse treatment. Any person found retaliating will be subject to disciplinary action, up to dismissal or removal from office.

8. Confidentiality & Data Handling

- 8.1 Identity of whistleblowers and witnesses is kept on a strict need-to-know basis. All records shall be retained securely for a reasonable time frame; access is restricted and monitored.

THE BOYS' BRIGADE IN SINGAPORE WHISTLEBLOWING REPORT FORM

Purpose:

This form is for reporting concerns about misconduct, unethical behavior, or any actions that may harm individuals, the organization, or the public interest. All information will be treated with strict confidence.

A. Your Relationship with the Organisation

Please select or describe your relationship:

☐ Employee / Staff

☐ Volunteer

☐ Vendor / Contractor

☐ Member of the Public

☐ Other (please specify): _____

B. Description of the Concern

Please provide as much detail as possible:

- What happened?

- When did it happen (date/time)?

- Where did it happen (location/department)?

- Who was involved or witnessed the incident?

C. Evidence

Please list or attach any supporting evidence (e.g., documents, screenshots, photos, emails, names of witnesses).

Details / Attachments:

D. Willingness to Be Contacted

Please indicate whether you are willing to be contacted for clarification or updates.

☐ Yes — I am willing to be contacted.

Preferred contact method: _____

Contact information: _____

☐ No — I wish to remain anonymous.

E. Immediate Risk Assessment

Do you believe there is an immediate risk to:

- People (e.g., safety or wellbeing)
- Property or funds (e.g., theft, fraud, damage)
- Organisation's reputation

☐ Yes

☐ No

If yes, please describe the risk:

Submission

You may submit this form by email: acchair@bb.org.sg or by post to:

The Boys' Brigade in Singapore

10 Kwong Avenue

Singapore 348884

(Marked "Confidential", Attention to Audit Committee Chairman and sealed in an envelope)

All reports are handled confidentially in accordance with our Whistleblower Policy.