

Purpose

Punggol Town Council (“PGTC”) is committed to maintaining high standards of corporate governance and complying with all applicable laws and regulatory requirements. PGTC does not tolerate or condone any malpractice, impropriety, statutory non-compliance, or wrongdoing which could result in reputational, financial, or non-financial losses to the Town Council.

Scope

This Whistle-blowing Policy (“Policy”) is intended to provide a framework to promote responsible and secured whistle-blowing without fear of reprisal, discrimination or adverse consequences, and allows PGTC to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

This Policy applies to the Chairman, Vice-Chairman, Elected Members and Secretary of the Town Council, Town Councillors, staff (including the managing agent) and contractors of PGTC.

This Policy ensures that no adverse action will be taken against the whistle-blower in retaliation for their good-faith disclosure of any suspected improper or inappropriate practices and misconduct.

Definition

Whistle-blowing is defined as the deliberate, voluntary disclosure of individual or organisational malpractice by a person who has had privileged access to data, events, or information about actual, suspected, or anticipated wrongdoing within or by PGTC that is within its control.

Reportable Incidents

The following are examples of reportable incidents covered by this Policy:

1. Forgery, fraud, or any conduct which constitutes an offence under the law;
2. Embezzlement, misappropriation, theft, or criminal misuse of PGTC’s funds, property, assets, or resources;
3. Corruption, bribery, or cheating;
4. Abuse or misrepresentation of power and authority;
5. Serious conflict of interest without disclosure;
6. Intimidation, discrimination, harassment, personal impropriety, or profession misconduct;
7. Unauthorised access to, misappropriation of, and/or disclosure of confidential information;
8. Concealing information about malpractice or misconduct and/or aiding and abetting such actions; and
9. Intentional provision of incorrect information to authorities.

The above list is intended to provide examples of reportable incidents and is not exhaustive.

Procedures on Reporting

A whistle-blower who is aware of any suspected unethical behaviour, malpractices, or improper conduct by a Council member, staff (including the managing agent), or contractor of PGTC, should report it via the following email channels:

Reporting On	Email
a) Chairperson of Town Council b) Town Councillors c) Staff (including the Managing Agent) d) Contractors of Town Council	whistleblow@punggol-tc.org.sg
a) Secretary of Town Council b) Chairperson of Audit & Risk Management Committee	Sun_Xueling@punggol-grc.sg

For the investigation to be authentic, accountable, and effective, all whistle-blowers are expected to provide as much detailed information as possible in their reports, including their contact details in case further information or clarification is needed. All reports and the identities of the whistleblowers will be treated with strict confidentiality.

Procedures on Investigation

If a *prima facie* case is established, the Secretary of the Town Council & Audit & Risk Management Committee (“ARMC”) Chairperson shall initiate the investigation. An Officer or a Town Councillor directed by the Secretary of the Town Council & ARMC Chairperson will lead the investigation. The investigation team shall consult and seek legal advice as necessary. If criminal offenses or corruption are involved, the matter may be referred to the Police or the Corrupt Practices Investigation Bureau (CPIB).

The investigation team shall handle all matters with confidentiality and complete the investigation within three months of receiving the whistleblower’s report. The investigation team may ask the whistleblower for further information or clarification.

To safeguard against possibility of bias, prejudice or conflict of interest, the person being complained shall not be participating or involved in the investigation team.

Upon completion of the investigation, the report shall be submitted to the Secretary of the Town Council & ARMC Chairperson. If the Secretary of the Town Council & ARMC Chairperson are not satisfied with the findings, they have the right to either:

- Request that further investigation be conducted by the same investigation team; or
- Appoint a fresh team of investigators; or
- Conduct his own investigation.

However, there may be circumstances where there is insufficient evidence to proceed, especially in the case of anonymous reporting. The investigation team shall advise the whistle-blower that there will be no investigation with reasons for the decision.

If the unethical behavior, malpractices, or improper conduct is proven, the Secretary of the Town Council & ARMC Chairperson shall decide on the appropriate course of action to be taken against the person(s) which may be any of the following:

- Reprimand, take disciplinary action, impose punishment
- Transfer staff to another department or office
- Termination or suspension of employment or appointment
- Report matter to the relevant authorities
- Any other action deemed appropriate by the Town Council

The investigation team shall make recommendation to the relevant department to implement procedures or take preventive measures to minimise or prevent the occurrence of the detrimental action or improper conduct in the future.

The decision on the corrective actions to be taken and the action taken against the person(s) found to have committed the detrimental action or improper conduct shall be communicated in writing to the whistleblower.

Where the concern raised by the whistleblower relates to the Secretary of the Town Council / ARMC Chairperson, it will be referred to the Chairperson of the Town Council, who will be responsible to commission the investigation and decide on how the investigation is to proceed.

Protection of Whistle-blower

The Policy is meant to protect genuine whistleblowers from any unfair treatment as a result of their report. All reports must be made in good faith and PGTC will protect the confidentiality and anonymity of the whistleblower, consistent with the need to conduct an adequate review.

The Policy is not a route for taking up personal grievances. False, misleading, frivolous, or unsubstantiated claims or complaints will be disregarded. PGTC does not condone any abuse of the Policy for personal gains, or with malicious intent, and will reserve its right to take action against those who abuse the Policy for personal gains, or with malicious intent.

If a whistleblower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should follow the procedure for reporting under this Policy promptly to facilitate further investigation and the taking of appropriate action.

Complaint Register

All investigation reports and relevant documents received by the investigation team shall be recorded, filed and secured.

The Chairman of the Town Council shall maintain a Complaint Register for the purpose of recording details of all complaints received, including the date, nature and status of such complaints. The Complaint Register shall be handed over to the succeeding Town Council Chairman.

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