



Image Mission Ltd

Whistleblowing Policy

Version 0.4

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1. Introduction

1.1 Purpose

This Whistleblowing Policy is designed to provide a clear and accessible framework for reporting concerns related to suspected wrongdoing or dangers within Image Mission Ltd (the "Organisation"). It underscores our commitment to maintaining high standards of ethical conduct, accountability, and transparency. We encourage all stakeholders to raise concerns without fear of reprisals or victimisation.

1.2 Scope

This policy is applicable to all individuals associated with the Organisation, including employees, volunteers, contractors, suppliers, and clients. It ensures that everyone can report concerns confidently, knowing they are protected from any adverse actions as a result of their disclosures.

2. Definition of Wrongdoing

Wrongdoing encompasses a variety of activities that are illegal, unethical, or contrary to the values, policies, and mission of the organisation. Recognising and reporting these actions is crucial to maintaining our organisation's integrity and trustworthiness. Wrongdoing includes, but is not limited to:

- **Illegal Acts or Omissions:** Any action that violates local laws, such as theft, fraud, or embezzlement.
- **Financial Fraud or Mismanagement:** Manipulation or misrepresentation of financial records, misuse of funds, or any activity that deceives stakeholders about the organisation's financial health.
- **Corruption or Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions or decisions of an individual or organisation.
- **Criminal Activity:** Any criminal offense committed by an individual associated with the organisation, including but not limited to assault, harassment, or drug-related offenses.
- **Non-Compliance with Legal Obligations:** Failure to adhere to legal requirements, including regulations related to employment, taxation, environmental protection, and data protection.
- **Health and Safety Risks:** Actions or negligence that endanger the health and safety of employees, volunteers, clients, or the public, such as failure to follow safety protocols or provide necessary protective equipment.
- **Breach of Internal Policies and Procedures:** Violation of organisational policies, codes of conduct, or ethical guidelines, including conflicts of interest, misuse of organisational resources, or inappropriate behavior in the workplace.
- **Concealment of Information:** Deliberate hiding or withholding of information that is vital to decision-making, accountability, or the safety and well-being of stakeholders.

Recognising these forms of wrongdoing and reporting them promptly is essential to ensure that the organisation operates with transparency, accountability, and adherence to legal and ethical standards. We encourage all stakeholders to be vigilant and report any concerns they may have related to these or any other activities that could harm the organisation or its stakeholders.

3. Reporting Procedures

Individuals should report concerns as soon as they arise. Prompt reporting helps preserve evidence and increases the effectiveness of investigations. Individuals should report concerns either:

- **Formally** by reporting to the Whistleblowing Officer or through designated [online form](#).

Reports should include:

- Nature of the wrongdoing
- Dates and places of occurrence
- Any evidence available
- Identity of the alleged wrongdoer, if known

4. Confidentiality

Confidentiality of the whistleblower will be fully maintained as far as possible throughout the investigatory process. Reports will be handled sensitively and access to information will be limited to those involved in the investigation.

5. Protection

The organisation is committed to protect whistleblowers against retaliation, harassment, or victimisation for reporting concerns in good faith.

6. Investigation

If an investigation is necessary, an independent and neutral investigation officer will be appointed to lead the process. The investigation will be carried out promptly and impartially. While a specific timeline cannot be guaranteed depending on the complexity of each case, a reasonable timeframe for completing the investigation will be aimed for. Throughout the process, whistleblowers will be kept informed of the progress and outcomes, with confidentiality and legal constraints being fully respected.

7. Feedback

- **Immediate Acknowledgment:** Confirm receipt of the report within 48 hours.
- **Initial Assessment:** Complete a preliminary assessment of the report within one week to determine the next steps.
- **Investigation:** Conduct a thorough investigation and aim to complete it within 30 days, if possible. If the investigation requires more time, provide the whistleblower with an update explaining the delay.
- **Final Follow-Up:** Share the outcome of the investigation with the whistleblower within two weeks of completing the investigation.

8. Contact Details

- Whistleblowing Officer: [\[Name/Title\] please nominate a name \(Chair\)](#)
- Email: [\[Email\] suggest creating a new email address report@imagemission.org](mailto:report@imagemission.org)
- [Online Whistleblowing Report Form](#)

9. External Reporting

External reporting to regulatory bodies or law enforcement is permitted where internal resolution is inadequate or inappropriate.

10. Anonymity

Anonymity will be respected, though it may limit the ability to conduct a thorough investigation.

11. Record Keeping

Records of all concerns and investigations will be maintained confidentially in compliance with data protection laws.

12. Implementation of Recommendations

Recommendations from investigations will be implemented to address and prevent further occurrences of wrongdoing.

13. Responsibilities

- **Employees and Volunteers:** To report any concerns of wrongdoing.
- **Whistleblowing Officer:** To administer this policy and maintain records and oversee the initial assessment of reports.
- **Investigation Officer:** To conduct impartial investigations, ensure confidentiality, and report findings in a timely manner.

14. Review and Updates

- This policy will be monitored regularly and reviewed annually to ensure its effectiveness and compliance with legal standards and organisational environment.
- Seek input from staff, and board members during the review process.

15. Policy Communication

Communicate this policy to all volunteers, staff, and board members through orientation sessions, handbooks, or online platforms.

We are committed to a culture of openness, transparency, and accountability. This policy is part of our commitment to ethical practices and maintaining trust with our clients, donors, and the public.

ANNEX

Whistleblowing Report Form

Revision History

Version	Date	Description of Changes	Revised By
0.1	21 Apr, 2024	Initial draft	Jenny Fang
0.2	13 Sep, 2024	Updated based on board and ED comments	Jenny Fang
0.3	10 Nov, 2024	Updated sections 3, 4 and 6	Cheryl Ong
0.4	20 Oct 2025	Updated from last draft	Philomena Ang