



CODE OF CONDUCT

Updated on Nov 2024

FOREWORD

Singapore Children's Society protects and nurtures children and youth of all races and religions. Established in 1952, our services have evolved to meet the changing needs of children. Today, we operate more than 10 service centres island wide, offering services in the four categories of Vulnerable Children Services, Children and Youth Services, Family Services, and Research and Advocacy.

As we continue to develop more services and programmes to meet the growing needs of children, we need to have in place a well-defined set of governance processes and internal controls. This is imperative so that we will continue to meet a high standard of governance, achieve more without compromising our conduct and at the same time, not slow things down through unnecessary bureaucracy.

The establishment of this Code of Conduct moves Singapore Children's Society to another dimension of corporate governance, accountability, transparency and sustainability. It is our yardstick and operating parameter on the way we conduct ourselves before all our service users, stakeholders and the public.

With effect from 1 Jun 2015, we have put in place a whistleblowing policy that sets out the avenues for staff to raise concerns on irregularities within the organisation directly to the CEO or the Audit and Risk Committee. Staff are encouraged to report matters in good faith, without fear of unfair treatment or any adverse consequences. This policy is part of our effort towards delivering a high standard of ethical conduct and demonstrates our zero tolerance policy towards fraud.

To my fellow Committee Members and Staff, thank you for your cooperation. Together, we will move forward to bring better days to our children.

Koh Choon Hui *DUBC*
Chairman
Singapore Children's Society

1 General Introduction of the Code of Conduct ("Code")

1.1 Definition & Objectives of the Code

This Code represents the commitment of Singapore Children's Society (hereafter referred to as "Society") to conduct its activities and operations lawfully and ethically to the highest standards possible. This Code shall apply to all Board Members, Standing Committee Members and members of work groups established by the Board (hereafter referred to as "Committee Members") and employees (hereafter referred to as "Staff") of the Society.

Committee Members and Staff¹ are expected to meet the Code's high standards of legal and ethical conduct. All Committee Members and Staff must conduct themselves at all times with honesty and propriety. The Society's success pivots on its Committee Members' and Staff's reputation for integrity, trust and confidence.

Whilst the Code attempts to cover as many areas as possible, it may not be exhaustive. If there are any queries or issues, Committee Members and Staff are advised to consult or address their concerns to the Compliance Department or the Human Resource Department respectively. Please refer to Section 7 for administration of this Code.

1.2 Objectives of the Society

Mission

To bring relief and happiness to children in need

Vision

To be a leading-edge organisation in promoting the well-being of the child

Core Values

- Caring & Compassion
- Commitment
- Professionalism
- Integrity
- Openness To Change

1.3 Accountability to Stakeholders

The Society is accountable to its stakeholders in terms of how it conducts its activities. The Society's role in meeting the needs of its stakeholders is as follows:

- a. **Service Users**
To offer a variety of programmes and services to meet their needs.
- b. **Volunteers**
To create opportunities for volunteers to contribute in meaningful ways and in so doing, to grow with the Society.
- c. **Donors**
To develop and maintain rewarding and fulfilling long term relationships with donors.
- d. **Staff**
To recognise that human capital is one of the key assets of the Society and to ensure that Staff have a safe and conducive working environment with competitive employment terms and conditions of service.
- e. **Community**
To be a responsible member of the social service sector responding to community needs

¹ Staff are required to read the Staff Handbook, in addition of the Code of Conduct.

and developing mutual respect, and goodwill with other social service agencies and government agencies. The Society shall observe cultural, political, social and environmental issues in all its activities and operational decision-making processes.

- f. Suppliers
To develop and maintain amicable working relationships with suppliers and contractors.

2 Confidential and/or Proprietary Information

2.1 The Society, subject to confidentiality requirements, is committed to objective and open communication as part of good corporate governance. Any information not released to the public is considered confidential and should be handled on a 'need-to-know' basis. The use of Society information for personal benefit is strictly prohibited and may constitute a criminal offence.

2.1.1 Confidential information may only be disclosed by Committee Members and/or Staff who are authorised to do so or in the below conditions:

- a. In the case of Staff, he/she requires the information to carry out his/her duties;
- b. In the case of a Committee Member, he/she is authorised by the Board/ Standing Committees to furnish such information for a specific reason;
- c. In the case of a third-party appointed by the Society, he/she is authorised to receive such information;
- d. The disclosure is required by law or requested for by Regulatory Bodies.

2.1.2 Upon departure of service or employment from the Society, the Committee Member or Staff must not keep any Society's confidential information with them.

2.1.3 If Committee Members or Staff encounter any doubt or difficulty in handling sensitive information, he/she should refer the matter to the Human Resource Department or CEO.

2.2 Proprietary Information of the Society

Programme materials or Society related information developed by Committee Members and/or by Staff during their service or employment with the Society is deemed to belong to the Society. Committee Members and Staff are not to remove or keep a copy of such materials unless permission is granted by the Society.

2.3 Personal Data

The Society takes a serious stand in protecting the personal data of donors, potential donors, staff, volunteers, service users and participants of events (hereafter referred to as 'Personal Data'). Breaches involving Personal Data could result in reputational and financial loss to the Society and cause harm to the affected individuals. Committee Members and Staff are strongly encouraged to adhere to good practices for safeguarding both physical and electronic Personal Data, which include but are not limited to the following:

- i. Ensure that only the appropriate amount of Personal Data is held, as holding excessive data will also increase the efforts required to protect Personal Data
- ii. Personal Data should not be disclosed to unauthorised persons
- iii. Physical copy of Personal Data including printouts should be kept secured at work desk. Physical records should not be left unattended in the common areas. This applies in the office and home environment. Any uncollected printouts or faxes that contain Personal Data should be destroyed as soon as possible
- iv. In the event where there is a transfer of Personal Data (e.g. where Personal Data is sent to vendors for printing of mailers), the electronic file containing the Personal Data must

be encrypted/password protected. The encryption key/password should not be revealed in the same email as the document in order to avoid compromise of security. The password should be sent via a separate email (with a different subject header) or via another medium (e.g. WhatsApp or SMS).

- v. Hardcopy records of personal data must be shredded or destroyed through a secure document disposal service. Soft copy records in shared drives that have no more use should be deleted.
- vi. Periodically, SCS will conduct cyber security assessments and anti-phishing campaigns to raise staff awareness of potential data breaches.
- vii. Risk mitigation - In the event that certain employees are identified (e.g. through Society's cyber security assessments and anti-phishing campaigns) to be particularly vulnerable to scams or phishing campaigns such that they may expose the Society to a risk of data breach, these employees may be subjected to a re-assessment of their job roles and responsibilities, particularly roles that involve accessing databases containing confidential information of the Society.

Note: For guidance on Personal Data, please refer to the Society's Information Security Policy for further details.

3 Conduct of Operations

3.1 Integrity

Committee Members and Staff are expected to act with integrity at all times in their dealings with the Society's stakeholders as described in paragraph 1.3. In discussions with these parties, accurate data and information shall be presented. Committee Members and Staff shall not wilfully submit a proposal or statement, which they know to be false, incomplete or misleading.

3.2 Interaction with Service users

Committee Members and Staff shall not, under any circumstances, engage in personal relationships with the Society's service users and/or the service users' family. Examples of personal relationships may include but are not limited to sexual activities/contact, giving and/or accepting gifts, taking pictures or videos for personal usage, providing personal social networking contacts, posting of service users' pictures or videos in personal social media platforms etc. (Please refer to Code of Professional Ethics from Singapore Association of Social Workers for a more comprehensive list of examples.)

Committee Members and Staff shall not maintain direct contact with the service users and/or the service users' family or bring them out on outings in their personal capacity.

Please refer to Code of Conduct for Staff working with Service Users (Annex A) for more details.

3.3 Bribery, Gifts & Entertainment

The Society shall comply with all the laws and regulations in the areas which it operates and shall conduct its activities in an ethical manner. Bribery is inconsistent with the Society's values and ethics and any payment, or promise of payment or any other similar inducements, which are not in direct pursuance of our Society's mission, made directly or indirectly in any form, to gain perceived advantage for the Society is strictly prohibited.

All donations, favours and entertainment from third parties shall be handled prudently. Accepting lavish or excessive gifts and entertainment/hospitality can create expectations that may potentially be problematic for the Society. Committee Members/Staff should not solicit or accept any personal gifts, money or favours from the vendors, procurement tenderers, service

users or their families. In the event whereby it is difficult to refuse a gift, this should be declared in writing to the respective Centre Head who will decide how to manage it in consultation with Human Resource Department, Compliance Department or the CEO.

Likewise, the offering of lavish or excessive gifts or entertainment/ hospitality to outside parties should not be practised. Gifts, favours and entertainment/hospitality may be provided on behalf of the Society if:

- i. They are consistent with generally accepted work practices, customs and ethical standards;
- ii. They cannot be construed as bribes, enticement or kickbacks in any way, with regard to form, cost, frequency of giving and the manner and circumstances under which they are given;
- iii. They do not violate the laws and regulations of Singapore or those of the Society;
- iv. The Society will not be embarrassed or be liable for any legal or regulatory liability.

In determining their propriety, the following factors shall be considered:

- i. Form and cost of the gift, favour or entertainment/hospitality, their frequency, timing and manner of the giving;
- ii. Whether the setting and context are conducive to building or maintaining a good working relationship;
- iii. Whether the gift, favour or entertainment/hospitality are, or can be, fully visible to the management or authority of the organisation or entity whose employee or representative receives it.

Approval must be sought from the Committee Members, if the recipient represents the Government or Statutory Boards or is regulator-linked, before the gift, favour or entertainment/hospitality can be made. Government bodies may have restrictions on the provisions of business or social courtesies or things of value offered to government employees. Committee Members and Staff conducting dealings with government bodies must know and respect all such restrictions. It should be noted that any such gift, favour or entertainment/hospitality must never be construed as an attempt by the Society to exert improper influence on such individuals. Exceptions may be made for tokens of appreciation given to Guests of Honour at the Society's official functions if the gift value does not exceed \$250, is a donated item or is crafted by the Society's children, clients, volunteers or Staff.

3.4 Political Activities

The Society is an independent Social Service Agency, and is not linked or affiliated to any political party in Singapore. It remains neutral on political issues. However, when the need arises, the Society will lobby, within legal limits and boundaries, on issues that concern its operations/activities and its stakeholders, so as to promote, protect and preserve its interests and those of its stakeholders.

3.5 Harassment and Discrimination

The Society supports the cultural and ethnic diversity of its workforce. The Society maintains a work environment that enables it to attract, retain and fully engage diverse talents that can contribute effectively to its continued growth and success as a role model among voluntary welfare organisations.

The Society takes allegations of harassment, including sexual and racial harassment, seriously and prohibits all forms of discrimination based on race, religion, gender, age, marital status, etc. If a Committee Member or Staff is aware of such harassment or discrimination, he/she should report this to the Human Resource Department or the CEO. The identity of the Staff concerned shall be kept confidential.

3.6 Health & Safety

The Society undertakes to provide a safe and healthy work environment for the Staff and other persons at work in accordance with the Singapore Workplace Safety and Health Act, The Employment Act and the Work Injury Compensation Act. In turn, Staff and other persons (e.g. volunteers, suppliers) owe to the Society a duty to fully co-operate and observe safety and health regulations and practices in the Society. All parties must jointly work towards an accident-free work environment. Staff who are aware of unsafe work conditions or processes should notify the Human Resource Department so that appropriate measures can be taken to remove or minimise such health and safety hazards from the workplace.

3.7 Illegal Drugs/Substances, Alcohol & Fitness for Duty

The Society is committed to a work environment free of illegal drugs/substances and alcohol which can compromise Staff integrity and safety in the workplace. The use, sale or possession of illegal drugs/substances (include but is not limited to drugs and vapes) at the Society's premises is strictly prohibited. The use or sale of alcohol at the Society's premises is also not allowed. When reporting for work and during working hours, Staff must at all times be free from the influence of unlawful drugs/substances, and alcohol in the workplace.

Fitness for duty means that Staff are physically and mentally fit to perform their duties safely and efficiently without endangering themselves or others. If Staff are not well, they should seek medical treatment.

3.8 Teamwork

Teamwork and co-operation are critical aspects of the Society's work culture. The Society leverages on the dynamics of the Committee Members' and Staff's collective skills, knowledge and experience to achieve the best results for the Society's stakeholders.

3.9 Communication with the Media and External Parties

The Strategic Communications and Outreach (SCO) Standing Committee is responsible for all corporate communications. The Society may in some instances designate certain individuals to be its spokesperson on specific subjects. Unless a Committee Member or Staff has been given such expressed authority, he/she shall refrain from speaking or writing to the local or international media on matters which affect the Society. Subject to the nature and sensitivity of the subject matter, Committee Members and Staff are advised to direct queries from external parties concerning the Society's matters, to the Strategic Communications and Outreach Department.

3.10 Entering into Contractual Relations

Unless otherwise expressly authorised, Committee Members and Staff are not allowed to enter into a contractual relationship with a third party on behalf of the Society. Examples of third parties with whom the Society enters into contractual arrangements include donors, suppliers, corporate partners, banks etc. If the nature of work or position requires the Board Member or Staff to enter into such contractual relationship on behalf of the Society, they must be authorised to do so by the Society through its Standard Operational Procedure for Internal Controls or by the Board.

3.11 Information Technology (IT) Resources

- i. The Society provides Staff with IT devices to facilitate work and communications with other parties. However, if such IT devices are needed by Committee Members to carry out specific functions, the following procedures are to be followed:
 - a. New purchases will require approval according to the Society's procurement process.

- b. The IT devices assigned to the Committee Members shall be returned to the Society on completion of the assignment.
- ii. All Society-related information created by Committee Members or Staff, is deemed to belong to the Society. The Society reserves the right to audit or discontinue the IT devices at any time without notice and reasons.
- iii. The Society expects Committee Members and Staff to use its IT devices for work purposes. In so doing, they shall adhere strictly to the laws and ethics governing the use of such IT devices. Installing any unapproved software or applications in the Society's IT devices is strictly prohibited. Disciplinary action will be taken against those who violate this rule.

3.12 Handling of Society Properties

In order for Committee Members and/or Staff to perform their duties, they shall be entrusted with property or equipment which they are expected to take care of. It is their responsibility to take care of and protect such properties or equipment from loss, damage, misuse and theft.

The Society's premises, properties and equipment are used to advance its interests. Committee Members and Staff shall not be permitted to use such premises, properties or equipment to carry out illegal activities or to generate any profits for personal gain. Properties and equipment shall be returned to the Society when the Board Member relinquishes his/her position or when the Staff ceases employment with the Society. Unless it is for work reasons, no Committee Member or staff shall be allowed to remove the Society's properties and equipment to another location.

4 Conflict of Interests

4.1 Definition

Conflict of interests arises whenever the personal or professional interests ('interests') of a Committee Member or Staff or close member(s) of their family² may interfere with the performance of their official duties or with their decision-making on matters related to the Society. Conflict of Interests situations include those actual, potential or perceived.

The Society's Conflict of Interests Policy is to safeguard the integrity and accountability of its Committee Members and Staff. Conflict of Interests situations may include but are not limited to those stipulated in Annex B.

4.2 Disclosure Policy and Procedure

- a. This policy must be read and understood by all Committee Members and Staff upon the commencement of their term of office or employment. New Committee Members are required to submit a Declaration of Interest within a month of joining the Committee. New staff are required to submit a Declaration of Interest at the point of signing the engagement letter. Submission of Declaration of Interest will include those actual, potential or perceived Conflict of Interests situations.
- b. Committee Members and Staff are required to submit their Declaration of Interest annually, within one month from the Society's annual general meeting, and as soon as there are changes in their Interests such that there is a risk of conflict (e.g. staff is related to one of

² Close members of the family of a person are those family members who may be expected to influence, or be influenced by, that person in their dealings with the Society. In most cases, they would include:

- Children and spouse;
- Children of spouse; and
- Dependants of Members, Staff or Volunteer, or dependants of their spouse.

the service users, or has business, volunteer dealings with other organisations or Social Service Agencies). Staff should refer to the Staff Handbook for more details on additional employment and volunteering activities.

- c. Committee Members should submit their Declaration of Interest to the CEO, who shall bring these matters to the Board for deliberation.
- d. Staff should submit their Declaration of Interest to Human Resource Department, who shall bring these matters to the CEO for approval. The CEO and the Human Resource Department shall keep the Honorary Secretary informed of all declarations of interest annually.
- e. Transactions with parties with whom a conflict exists may be permitted only if all of the following are observed:
 - i. The nature of the relationships and conflicting interest is to be fully disclosed;
 - ii. If any of the members/staff on the Tender Panel has actual, potential or perceived conflict, the member/staff will be replaced by another member/staff without any actual, potential or perceived conflict;
 - iii. If any of the supporting staff for the Tender has actual, potential or perceived conflict, the supporting staff will be replaced by another support staff; and
 - iv. Any Board member with actual, potential or perceived conflict of interests is required to recuse himself/herself from voting or the decision-making process.
- f. The Board/Standing Committee(s) shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorised as just, fair and reasonable to the Society. The decision of the Board / Standing Committee (s) shall rest in their sole discretion, and their concern must be the welfare of the Society and the advancement of its purpose. Any Board or committee member who has an actual, potential or perceived conflict of interest should abstain from the decision-making process. All decisions made by the Board/Standing Committee(s) on such matters shall be recorded, filed and copied to the Society's Chairman. Board will be notified of the conflict prior to approval for the decision. Board shall have the power to cancel, revoke, rescind any decision, contract (if any conflict of interest has been discovered).
- g. Any disclosure of interest made by Committee Members and Staff where they may be involved in a potentially conflicting situation(s), must be recorded, filed and updated appropriately by all specified parties.

5 Fraud

5.1 Zero Tolerance Policy

The Society maintains a zero tolerance policy towards fraud. This policy not only applies to all the Society's Committee Members and Staff but also applies to the Society's vendors, suppliers and partners to the extent that the Society's resources or reputation may be involved or affected.

The Society defines fraud as intentional deception, misappropriation of resources or manipulation of data or information to the advantage or disadvantage of a person or entity. Some examples of fraud include:

- Falsification of financial results;
- Falsification of expenses, invoices and quotations;
- Alteration or falsification of records;
- Failure to account for monies collected; or
- Knowingly providing false information on job applications or in relation to requests for funding.

5.2 Fraud Detection and Reporting

The Society is committed to put in place checks and balances to deter and prevent fraud.

All Committee Members and Staff have a duty to report concerns, which they may have, or reliable information provided to them, about possible fraudulent activity of any Board Member, Staff, vendor, supplier, corporate partners or any other party associated with the Society.

Given the seriousness of allegations of fraud and that persons who are of more senior in rank or hierarchy could be involved in such allegations, several independent reporting avenues shall be made available to ensure confidentiality and impartiality.

Committee Members may report their concerns to any of the following, as appropriate:-

- Chairman
- Honorary Secretary
- Honorary Treasurer

Staff may report their concerns based on Society's Whistleblowing Policy for Staff.

All reports of fraud will be taken seriously and shall be investigated accordingly. The person reporting the incident shall be obliged to identify himself or herself to any of the Committee Members or CEO before investigations can proceed. The Society will not act on an anonymous allegation of fraud.

The identity of the person reporting shall be kept confidential, within the limits allowed by law. The Society does not tolerate any reprisals or retaliations against the person who file such reports if the person has acted reasonably and in good faith and has co-operated in the Society's investigations. The Society, however, cannot protect persons who file reports which they know to be false and without reasonable belief in the accuracy of the information. Persons who maliciously fabricate their reports and feedback shall be severely dealt with.

The Board shall be informed of any investigation resulting in confirmation of a fraudulent act. If deemed necessary, the Society shall notify and fully co-operate with the appropriate law enforcement agency in any investigation.

Violations of this Code shall not be tolerated, and violators shall face disciplinary action or dismissal by the Society. Violators shall be reported to the relevant authorities. In cases involving monetary losses, the Society may pursue the recovery of such losses.

6 Finance and Integrity of Accounts

The Society has the highest regard for truth, openness, completeness and accuracy in the recording of transactions. At all times, records must comply with recognised accounting standards, and financial transactions must be executed only in accordance with management's authorisation, the Society's financial policies and directives.

No payment may be requested, approved or made with the intention that any part of such payment is to be used for any purpose other than as described in the document supporting it. All financial transactions fall under the purview of the Finance Department and Compliance Department and any related enquiries shall be directed to the Compliance Department.

The Society is committed to disclose complete and accurate information in all material respects to the public regarding the financial conditions and results of operations in accordance with the requirements as specified/required by the regulatory body.

7 Administration of the Code

It shall be a breach of the Code for any Committee Member or Staff not to report any violation of the

Code that comes to his or her knowledge.

Apart from the reporting procedures for Fraud (as stated in Section 5.2), all Committee Members and Staff shall report any concern or information they may have, concerning a possible violation of the Code to any of the following persons:

- Chairman
- Honorary Secretary
- Honorary Treasurer
- CEO
- Senior Consultant
- Head of Department

All reports of violations of the Code shall be taken seriously and shall be investigated accordingly. The person reporting must, however, identify himself or herself before investigations can proceed. The Society will not act on an anonymous allegation of violation of the Code.

All Committee Members and Staff are responsible for fully understanding and complying with the Code, including any updates or changes that may be made to the Code from time to time. They shall be asked to declare that they have read, understood and would comply with the Code. This procedure may be undertaken on a periodic basis to be determined by the Board or when there are updates to the Code.

8 Whistleblowing Policy

The Society has put in place a Whistleblowing Policy (Annex C) that sets out the avenues for Staff to raise concerns on irregularities within the organisation. The Policy allows for reporting by Staff to the CEO or the Chairperson of the Audit and Risk Committee without fear of unfair treatment or any adverse consequences.

The Society will not tolerate harassment or victimisation against Staff who raise a concern in good faith. Staff who believe that they are being unfairly treated as a result of having made a report may raise a complaint to the CEO or the Chairperson of the Audit and Risk Committee.

If Staff report a concern in good faith, which is not confirmed by subsequent investigations, no action will be taken against the Staff. In reporting a concern, Staff should exercise due care to ensure the accuracy of the information. If, however, an allegation is made frivolously, maliciously, or for personal gain, disciplinary action may be taken to deter any abuse of the Whistleblowing Policy.

This Code of Conduct contains proprietary information belonging to Singapore Children's Society and all copyright and other intellectual property rights in the Code of Conduct is owned by Singapore Children's Society. In the interest of common goals, Children's Society is happy to share the contents of the Code with other Social Service Agencies ('SSAs'). Children's Society requests that SSAs wishing to use the contents of the Code acknowledge Singapore Children's Society as the source.

CODE OF CONDUCT FOR STAFF³ WORKING WITH SERVICE USERS (ANNEX A)

The following stipulates the Society's expectations of staff working with our child, youth or adult service users (the Service Users). Any staff who violates this Code of Conduct will be subject to disciplinary action by the Society.

1 General Behaviour

- 1.1 Staff should always maintain good moral conduct at work and serve as role models for service users.
- 1.2 Staff's activities outside of work should not contravene that of the job nor affect public confidence in the individual and/or the organisation.
- 1.3 Staff will be terminated by the Society if they have committed or found to commit offences that are:
 - provided for in the Children and Young Persons Act, the Women's Charter and the Penal Code (Cap. 224);
 - related to possession of obscene/pornographic materials/child abuse material.
- 1.4 Staff who have been charged and/or convicted in any court of law for crimes under, but not limited to, the Registration of Criminals Act may be, in some cases, allowed to continue to be employed by the Society to take on jobs within the organisation but subject to the approval of the Review Committee.
- 1.5 Besides abiding by this Code of Conduct, Staff must also observe the Code of Ethics stipulated by the professional bodies that they are registered with (e.g., Singapore Association of Social Workers, Singapore Psychological Society, Singapore Association of Counselling).
- 1.6 It is the responsibility of all staff to report any ethical violations to the CEO and the relevant professional body.

2 Dress and Appearance

- 2.1 Dressing and appearance is largely a matter of personal choice. However, to uphold one's professional image and to set a good example for the service users, staff should avoid dressing in a manner that can be offensive or sexually provocative.
- 2.2 To avoid unnecessary distraction or misunderstanding, clothing with messages or pictures that are sexual or anti-social in nature that may be offensive should be avoided. All tattoos should be covered up.

3 Communication

- 3.1 To foster mutual respect between staff and service users, staff should be civil in their manner and speech and must not use words or remarks that are offensive or discriminatory that will demean, intimidate, humiliate, or embarrass the service users. In instances where staff are specifically tasked to provide personalized care and emotional support to identified service users, staff should still treat all service users impartially.
- 3.2 Staff should be mindful of the service user's age, gender, developmental stage, personality and past experiences, and be wary of their choice of words, tone and pace. This is especially important when dealing with sensitive cases. Staff need to also exercise tact, and not be unnecessarily intrusive or coercive when soliciting information from the service users. Leading questions ought to be avoided.

³ This includes volunteers who are working with service users.

4 Physical Boundaries

4.1 As part of the engagement of the service users, there may be moments of unavoidable physical contact between staff and service users (e.g., during sports activities). Staff are to exercise discretion and be guided by the following principles:

- Male staff should not touch female service users, unless in emergencies such as a fire evacuation or a medical emergency.
- Whether male or female staff, there should be no unwarranted and inappropriate touching of the service users.
- Intent of the physical contact/touches shall be for appropriate comfort, reassurance, encouragement with no possibility of harm, and must be restricted to the head, shoulder, upper back, arms and hands of the service users.
- As far as possible, settings should be at spaces where other staff are present or areas with adequate surveillance.
- Staff should not touch private and sensitive areas of the body of the service users under any circumstances, except when under the explicit instruction of the Centre Head in medical emergencies.
- It is important for staff to understand the history of the service users to ensure that any form of touch will not be misinterpreted as a threat (given that some of the service users may have experienced sexual abuse in the past) or encouragement to engage in inappropriate activity.

Body Checks

- At least 2 staff should be present when body searches / checks are conducted.
- Male staff are strictly not allowed to conduct body searches / checks on female service users.

Sexual Contact

- Any form of sexual contact or advances is strictly prohibited. Any sexual misconduct made towards a service user will be reported to the police and is subjected to police investigation.

4.2 When there is a need for one-to-one contact with a service user (e.g. during counselling sessions, or when staff engages a service user one-on-one), it is important to ensure that another staff is kept informed of the session. Room doors should not be locked during these one-to-one sessions.

4.3 Staff should also respect the privacy and dignity of the service users, notwithstanding their duty to ensure safety and compliance to rules. This will include being mindful when entering private areas such as bathrooms, toilets or any areas where service users may not be fully dressed. Male staff are not allowed under any circumstances to enter any area where female service users may be engaged in bathing, changing, sleeping or toileting, except in emergencies, and under the instruction of the Centre Head as well as in the presence of at least one female staff.

4.4 All precautions should be taken to avoid any misunderstanding or allegation against staff of the Society. These include avoiding any form of physically or verbally intrusive behaviour, or unwarranted physical contact with the service users.

5 Professional Boundaries

5.1 While engaging service users in meaningful and therapeutic relationships, staff must ensure that professional boundaries are maintained to avoid misunderstandings. The following good practices serve as a guide to help staff stay within the worker-client relationship:

- Staff should not buy gifts or items of significant monetary value for the service users in

- their personal capacity.
 - Staff should not borrow from or lend to service users any personal belongings, including money. Staff should tap on Casework Fund with the approval of the Centre Head if the service user met with an emergency.
 - Staff should not assist the service users in buying goods or services, unless with approval from the Centre Head in exceptional cases. The exceptions are not extended to prohibited items like cigarettes or pornographic materials.
 - Service users should not take staff's personal transport (e.g. car rides) or vice versa due to concerns over liability and, insurance coverage. Exceptions are allowed only in an emergency and / or subjected to the approval of Centre Head.
- 5.2 Staff should also refrain from using their working relationship to promote their personal values and beliefs (e.g., proselytise).
- 5.3 Staff or former staff shall not, under any circumstances, engage in close personal relationships (including sexual contact) with service users and/or former service users. In circumstances where such relationships have materialised, it is incumbent on the staff / former staff to prove that there is neither exploitation nor harm. Where necessary, staff / former staff should undertake supervision / professional consultations to address issues relating to authority, power and exploitation.
- 5.4 When a staff is assigned the duty to provide continuous support to former service users (such as after-care follow-up), staff acts as a representative of the Society and should uphold the conduct stipulated in this Code of Conduct. It is essential that the staff duly updates the Centre Head on the content and outcome of the engagement.
- 5.5 Similar professional boundaries must be maintained with the service users' families, and significant others.

6 Discipline

- 6.1 Under no circumstances should staff do the following in the name of discipline:
- Hit or physically assault a service user.
 - Shout at a service user except in emergencies to catch the service user's attention.
 - Use vulgarities at a service user.
 - Emotionally abuse a service user by ignoring or rejecting him/her or threatening him/her in ways that could result in emotional harm.
 - Use derogatory or discriminatory words that attack a service user's personal attributes, race, religion, culture, nationality, sexual orientation, age, gender, marital status, mental & physical abilities or political beliefs.
 - Humiliate a service user in front of other service users or praise a service user in front of other service users with the intention of demeaning the other service users.
 - Subject a service user to overly strenuous tasks or activities.
- 6.2 Staff are not to abuse their power and authority by carrying out inappropriate disciplinary measures as a form of personal attack against a service user.
- 6.3 Discipline should be developmentally appropriate and in accordance with best practices and with approval from the Centre Head.

7 Safety of the Service Users

- 7.1 The physical safety of service users is of paramount importance. All injuries suffered by the service users must be duly reported and treated, regardless of the cause of the injuries. Centre Head is to ensure that significant injuries sustained during the services/programmes are documented in incident reports. Parents/Guardians of the service users are to be duly informed of the injuries.
- 7.2 Staff must not bully service users. Staff should also prevent the service users from bullying one another. Allegations of bullying by staff must be reported to Centre Head or Higher Management and be thoroughly investigated.
- 7.3 A child service user below the age of four should not be left alone or with other service users without adult supervision.

8 Evaluation and Research

- 8.1 Staff who engage in evaluation and research shall adhere to relevant organisational guidelines or ethical review processes to protect participants. Guidelines include the following:
- Respect and maintain the confidentiality of all research data.
 - Keep all research information confidential by not discussing or sharing the information in any form or format with anyone other than the relevant staff.
 - Do not make copies of data in any form or format unless specifically requested to do so by Centre Head.
 - Keep all raw data that contain identifiable information in any form or format secure when they are in your possession.
 - Keep soft copy data in password-protected files and hard copy data in secured locations.
 - Close any computer programmes and documents containing such data when staff step away from the computer temporarily.
 - Use closed headphones when transcribing recordings or interviews.
 - Return all data to the Research Unit when the tasks have been completed.
- 8.2 Where possible, staff should obtain written consent from participants.
- 8.3 Staff shall provide appropriate measures to ensure that the rights of participants are protected e.g. where service user is too young to give consent, staff shall obtain written consent from an appropriate proxy or guardian.
- 8.4 Staff shall observe confidentiality, voluntariness, informed consent, and respect to participants when engaging them in evaluation or research work.
- 8.5 Staff shall ensure that appropriate steps are taken during evaluation and research to minimise possibility of harm to participants. Steps shall also be taken to ensure that participants have access to supportive services to address any discomfort that may arise from the evaluation and research participation process.
- 8.6 Staff shall report on the evaluation and research findings factually and accurately.

9 Confidentiality

- 9.1 All information obtained during one's work should be used for sole purpose of work and not discussed in casual conversation. These include information obtained verbally, as well as those documented in official reports. Access to written information should be restricted to those who require it for work purposes and not shared with any external party unless there is a valid reason and approval is obtained from the Centre Head.
- 9.2 Information on the service users should be accessed only when necessary, and not to fulfil personal curiosity or for any other purpose.
- 9.3 All information obtained from the service users must be kept confidential as far as possible. In circumstances when it is not possible to withhold information, for example when such information must be shared with the caregivers in the best interest of the service users, service users should be briefed on the limitations to confidentiality.
- 9.4 Communication with external parties (e.g., external supervisors, other stakeholders) on matters pertaining to service users are limited to the purpose of learning or collaborating for the benefit of the service users.

10 Financial Integrity

Personal gifts, money or favours should not be solicited or accepted from the service users or their families. In the event whereby it is difficult to refuse a gift, this should be declared in writing to the respective Centre Head for their advice on the course of action.

CONFLICT OF INTEREST SITUATIONS (ANNEX B)

Conflict of interest situations may include but **are not limited to the following**:

1 Contract with vendors

Where Members⁴, Staff or volunteers have personal and professional interest in transactions or contracts that the Society may enter into, the interested party is required to declare in the prescribed form such interest as soon as possible followed by abstention from discussion and decision-making on the matter (including voting on the transaction or contract). All such discussion and evaluation should be made by the remaining Member or relevant approving authority in arriving at the final decision. Such transaction/contract should always be recorded, filed and copied to the Society's Chairman.

2 Vested interest in other organisations

"Vested interest" is defined as having more than 5% shareholding in a listed company or having control (direct/indirect) over any private company (which may include having significant voting rights or a directorship in a company).

Where Members, Staff or volunteers who have vested interest in other organisations that have dealings/relationship with the Society, the interested party is required to declare such interest whenever dealings with these other organisations are discussed and/or to be agreed upon and if necessary, followed by abstention from discussion and decision-making on such matters.

3 Joint Ventures

Singapore Children's Society may not enter into joint venture with external parties without the approval of the Board. Where Members, Staff or volunteers have interest in such ventures, the interested party is required to declare its interest and abstain from any recommendation and decision on the matter.

4 Recruitment of staff

The Member or Staff, when involved with recruitment of staff should declare his/her interest if the applicant has family ties with him/her and should abstain and refrain from influencing decision on the recruitment.

5 Family members

Where Members, Staff or volunteers has close member(s) of the family⁵ who owns or works in organisation that has business dealing with the Society or considering entering into joint ventures with the Society, he/she must also disclose such information at the earliest opportunity and refrain from participating in decision making on matters where they have a conflict of interest. Staff must also disclose having a personal relationship where there is an immediate reporting relationship.

⁴ Members refer to Board and Standing Committee members,

⁵Close members of the family of a person are those family members who may be expected to influence, or be influenced by, that person in their dealings with the Society. In most cases, they would include:

- Children and spouse;
- Children of spouse; and
- Dependants of Members, Staff or Volunteer, or dependants of their spouse.

6 Volunteering

Where Members or Staff or volunteers have memberships in any other Social Service Agencies, he/she should declare his/her affiliation to the Social Service Agency and abstain from any matters involving the interested Social Service Agency to avoid any potential misunderstandings or actions that are not in the interests of the Society.

7 Additional Employment

If staff is engaged in employment outside working hours, staff must declare their appointments or the work involved and obtain the necessary approval as stipulated in the staff handbook. Should the external employment affect staff's judgement and compromise objectivity, staff must discontinue with the arrangement. A staff who fails to declare such an interest, and/or fails to discontinue the arrangement will face disciplinary action or possible dismissal.

8 Major Donors/Representatives on the Society's Board

Major donors and/or their representatives, who are also members of the Society's Committees, may present potentially conflicting situations such as the following:

- a. **Conflict of loyalty**
The Committee Member should not influence decisions relating to allocation of resources or setting the Society's directions that may directly or indirectly impact his/ her personal or professional interests as he/she may not have the overall best interests of the Society due to their vested interests/ priorities.
- b. **Influencing donor decisions**
Staff should not withhold information from Committee Members for fear that the allocation of funds from the corporations they represent will be affected. Issues of transparency and disclosure may arise.
- c. **Pressure to release additional information to donor**
Committee Members should not expect additional information from staff, e.g. details of service users etc.
- d. **Personal benefit / gain/ recognition**
The Committee Member should not expect or request for greater recognition for financial support given, than is usually accorded.
- e. **Others**
A Committee Member's organisation receives funding from Singapore Children Society.

WHISTLEBLOWING POLICY (ANNEX C)

1 Aim

Singapore Children's Society's Whistleblowing Policy ("the Policy") aims to set out the avenues for staff⁶ to raise concerns on irregularities within the organisation. The Policy allows for reporting by staff to the Chief Executive Officer (CEO) of Singapore Children's Society or the Chairman of the Audit and Risk Committee without fear of unfair treatment or any adverse consequences.

2 Scope

This policy sets out the avenues for staff to report improper or inappropriate practices that they observe to have occurred in the organisation.

Such improper or inappropriate practices may include:

- Theft and/or misuse of Singapore Children's Society's properties, assets or resources (including confidential information)
- Improper or unauthorised expenditures
- Breach or circumvention of internal policies
- Irregularities in financial reporting
- Failure to observe a law or regulation
- Any form of harassment
- Suspected sexual misconduct e.g. with service users and/or the service users' family members.
- Discrimination on the basis of gender, race and disabilities
- Abuse of power and authority
- Corruption and bribery
- Concealment or wilful suppression of any wrongdoing
- Endangerment to health or safety of persons or the environment

A staff member is expected to report a wrongdoing if he has sufficient grounds to believe that a wrongdoing has been committed, even if he has been instructed by his supervisor not to make a report.

3 Safeguards & Confidentiality

Singapore Children's Society will not tolerate harassment or victimisation against a staff member who raises a concern in good faith. A staff member who believes that he is being unfairly treated as a result of having made a report or given evidence as a witness in respect of the wrongdoing may raise a complaint to the CEO of Singapore Children's Society or the Chairman of the Audit and Risk Committee. Any form of retaliation undertaken against a staff member for raising a concern in good faith is prohibited. In such cases, disciplinary measures will be taken against the person undertaking the retaliation.

During the investigation process it may be necessary to reveal the source of the information and obtain a statement by the staff member as part of evidence. However, Singapore Children's Society will do its best to protect the staff member's identity. All information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation or to take any remedial action, in accordance with applicable laws and regulations. Particular care will be taken during staff appraisal and promotion procedures to ensure that the whistle-blower suffers no adverse consequences in this context.

Anonymity deprives the investigative services of the possibility of asking the source for clarification or more information and enhances the risk of frivolous, malicious or unreliable information. Concerns expressed anonymously may be considered at the discretion of Singapore Children's Society, taking into account factors such as seriousness of the issues raised and the likelihood of confirming the

⁶ For the purposes of this Policy, this is someone who is employed on either a permanent, contract or temporary basis or on secondment to Singapore Children's Society.

allegation from attributable sources.

If a staff member reports a concern in good faith, which is not confirmed by subsequent investigations, no action will be taken against that staff member. In reporting a concern, staff should exercise due care to ensure the accuracy of the information. If, however, an allegation is made frivolously, maliciously, or for personal gain, disciplinary action may be taken to deter any abuse of the Policy.

While the purpose of this Policy is to enable Singapore Children’s Society to investigate possible wrongdoing and take appropriate steps to deal with it, Singapore Children’s Society may not be able to disclose the precise remedial action that has been undertaken.

4 Reporting Mechanisms

The report may be made in writing to either the CEO or Chairperson of the Audit and Risk Committee through the channels listed below:

	CEO	Chairperson, Audit and Risk Committee
Mail	CEO Singapore Children’s Society 210 Middle Road #05-03 Singapore 188994	Chairperson, Audit and Risk Committee Singapore Children’s Society 210 Middle Road #05-03 Singapore 188994
Email	bmang@childrensociety.org.sg	Whistleblowing_AC@childrensociety.org.sg

The report should be as detailed as possible, and should include details such as the names of the parties involved, date of incident, type of concern, evidence substantiating the concern raised, and where possible contact details of the staff member raising the concern. All completed reports would be retained for a period of 5 years.

Reports made to the CEO of Singapore Children’s Society and the Chairperson of the Audit and Risk Committee will be screened and escalated to the Chairman of Singapore Children’s Society, who will then decide whether to report the matter to the Board. Where appropriate, the CEO of Singapore Children’s Society and the Chairman of the Audit and Risk Committee can decide to escalate the report directly to the Board.

Reports made may be investigated internally or referred to external parties such as the external auditors, or regulatory authorities.