



Hong Kong Society for the Protection of Children Whistleblowing Policy

A. POLICY

1. General

The Hong Kong Society for the Protection of Children (“Society”) is committed to the highest possible standards of openness, probity and accountability. The Society expects and encourages the employees and related third parties (e.g. parents, suppliers, service providers, etc.) who have concerns about suspected misconduct or malpractice or irregularities within the Society to come forward and voice those concerns. The Society will endeavour to respond to the concerns fairly and properly.

2. Scope

This policy is designed to enable all employees of the Society and related third parties to raise concerns, in confidence, about actual or suspected wrongdoing involving the activities of the Society. Examples of misconduct within the scope of this policy are set out in section 5 below.

This policy is not intended to replace the staff complaints policy in Chapter 8 of Staff Handbook covering complaints by staff members.

3. Protection of Whistleblower

Persons making appropriate reports in good faith under this policy will be supported and protected by the Society, even if the concerns raised turn out to be unsubstantiated.

Any staff member who victimizes or retaliates against those who have raised concerns under this policy will be subject to disciplinary actions.

4. Reporting Misconduct

All employees and other related parties are encouraged to take the initiative to disclose any actual or suspected misconduct relating to the Society which come to their notice. If there are questions about the contents or application of this policy in specific circumstances, the Compliance and Assurance Manager, at email address enquiry_RMD@hkspc.org, can provide the necessary guidance.



A report should be made in writing and be addressed to the Audit and Risk Management Director, and be sent by email (to whistleblowing@hkspc.org) or sent by post marked “strictly confidential” to “Audit and Risk Management Director, G/F, 387 Portland Street, Mong Kok, Kowloon”. It may (but need not) be made using the standard report form included in Appendix of this policy. The report, should include full details of the concern, including the personnel involved and the reasons for the concerns as well as any supporting evidence, if applicable.

Any report which the Society concludes is made maliciously or in bad faith may result in disciplinary or other appropriate action being taken against the whistleblower.

5. Misconduct, Malpractice and Irregularities

The following activities are considered to be a non-exhaustive list of possible misconduct that should be reported under this policy:

- any illegal activity (e.g. fraud);
- any breaches of legal or regulatory requirements;
- any breaches of conduct or internal control requirements;
- any physical or mental abuse, mistreatment and bullying of someone;
- any financial mismanagement, including misappropriation of assets and false financial reporting;
- any actual or attempted bribery or corruption;
- any action that results in a potential danger to someone’s health or safety;
- any other improper or unethical behavior, and
- any deliberate concealment of information concerning any of the matters listed above.

6. Confidentiality

The Society will make every effort to keep the whistleblower’s identity confidential. The whistleblower must keep the fact that he or she has filed a report, the nature of concerns and the identity of the personnel involved confidential to the extent possible.

The Society will not tolerate any act of “tip off” which means any person knowing or suspecting that a concern has been raised under this policy, discloses to any other person any information which will likely prejudice the investigation. The person who discloses such information will be subjected to disciplinary actions.

There may be situations in which, because of the nature of the investigation, it will be necessary to disclose the whistleblower’s identity including to any law enforcement authorities such as ICAC and the Hong Kong Police, in which case the Society will inform the whistleblower that his or her identity is likely to be disclosed.



7. Anonymous Reports

Although the Society will handle all reports, it encourages persons to put their name on any report. A failure to disclose the identity of the person making the report will materially hinder any follow up or investigation by the Society.

B. INVESTIGATION AND REPORTING

For any whistleblowing report, the Society will promptly contact the whistleblower to acknowledge receipt of the report and will promptly investigate all allegations made. The Society follows a standard handling protocol for whistleblowing report and, if necessary, is happy to explain to the whistleblower the details of the protocol. When the investigation is completed the Society may (but shall not be obliged to do so if it considers inappropriate) notify the whistleblower of the outcome of the investigation and any remedial action that may be taken as a result of the report.

Date of Policy Establishment:	21 July 2022
Target Group of the Policy:	Staff of Service Unit/Head Office, parents, suppliers and service providers.
Announcement of the Policy:	The Policy will be provided by Management of the Society to Heads of Service Units/Head Office Department for promulgation to staff. The Policy will also be placed in the Service Information Reference Folder of Service Unit/Head Office (or the Society's internet website) for reference of parents, suppliers and service providers.
Review of the Policy:	21 July 2025
Review arrangements of Policy:	The Audit and Risk Management Director will be responsible for conducting a review every 3 years, and any proposed changes to the Policy will be reviewed and approved by ARMCo.



WHISTLEBLOWING REPORT FORM

(STRICTLY CONFIDENTIAL)

The Society is committed to the highest possible standards of openness, probity and accountability, it expects employees and related third parties who have concerns about any suspected misconduct or malpractice or irregularities within the Society to come forward and voice those concerns.

It is recognised that in most cases the person raising concerns will wish to be dealt with on a confidential basis. All reasonable efforts will therefore be taken to avoid revealing the person's identity.

Whistleblowing reports can be made in writing by completing this report form or in such other written form as the person raising the concern may wish. After completion, please email to whistleblowing@hkspc.org or by post marked "Strictly Confidential" and addressed to "Audit and Risk Management Director, G/F, 387 Portland Street, Mong Kok, Kowloon".

Your Details The Society encourages you to provide your name and contact details with this report. Concerns expressed anonymously will only be considered as far as practicable subject to the availability of adequate information.	Name:
	Position:
	Division/Department:
	Tel No.:
	Email/Address:
	Date:

The Names of Personnel involved:
Details of the Concerns: (Please provide full details of your concerns including dates, names, and places as well as the reasons for the concerns together with supporting evidence; use separate sheets if necessary)

Personal Information Collection Statement

All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. The personal data submitted will be held and kept confidential by the Society and may be transferred to parties with whom we will contact during our handling of this case, including the party being complained against or other parties concerned. The information provided may also be disclosed to law enforcement authorities or other concerned units. Where relevant, under the Personal Data (Privacy) Ordinance of Hong Kong, you shall have the right to request access to and correction of your personal data. If you wish to exercise these rights, requests should be made in writing to the "Audit and Risk Management Director of the Society at G/F., 387 Portland Street, Mong Kok, Kowloon". For details, please refer to the "Privacy Policy" in the official website (<http://www.hkspc.org>).