



## Whistle-blower Policy

## 1 Policy statement

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Philanthropy Australia conducts its business with the highest standards of integrity and honesty. We expect everyone to maintain the same standards. We therefore encourage an open culture between our managers, employees and all people with whom we engage in the course of our business.

Philanthropy Australia People are encouraged to report any wrongdoing at or related to Philanthropy Australia that falls short of our business principles. However, we recognise that our people may not always feel comfortable about discussing their concerns internally, especially if they believe Philanthropy Australia is responsible for the wrongdoing.

The aim of this Policy is to ensure that Philanthropy Australia People:

- Feel confident that they can raise any matter that concerns them;
- Know that if they do, it will be taken seriously and treated as confidential; and ☐ Know that no action will be taken against them as a result.

Philanthropy Australia People are encouraged to use the procedure set out below if they have any concerns at all about wrongdoing at work including: any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk, or a concealment of any of these.

## 2 Related documentation

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- Philanthropy Australia Rules
- Philanthropy Australia Code of Practice.

## 3 Definitions

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*Philanthropy Australia People*: any member of Philanthropy Australia staff, Members, Associate Members, volunteers, supporters and/or contractors.

## 4 Operating principles

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### **SUBJECT MATTER OF DISCLOSURES**

Philanthropy Australia People are encouraged to disclose any matter concerning the conduct of Philanthropy Australia business which leads them to believe that malpractice is occurring, may occur or has occurred. In particular, they should disclose the occurrence or likely occurrence of any of the following:

- The commission of a criminal offence;
- Any failure to comply with a legal obligation or regulatory requirement applicable to the business;

- Any risk to health and safety;
- Any damage to the environment; and
- The concealment of information that reveals any of the above matters.

## 5 Procedure

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### **WHO**

Normally, Philanthropy Australia People should raise their concerns with the CEO. However, if the activity they wish to report involves the CEO, or they think it is inappropriate to disclose the information directly to the CEO for any reason, then they should raise their concerns with the Chair, or Vice Chair of Philanthropy Australia.

If they would like to raise their concerns externally then the contacts are:

☒ The Philanthropy Australia Company Secretary

Contact should be made via the Philanthropy Australia head office switchboard (03 9662 9299) and the relevant person will call them back. The caller does not need to disclose why they are calling or provide any details of their concerns.

### **CONFIDENTIAL**

Any disclosure under this procedure will be treated as completely confidential and will not result in any report to anyone within our organisation unless they agree to the contrary, or it is required by law.

### **ANONYMOUS**

Philanthropy Australia People may raise any concerns under the procedure anonymously, in writing, to the appropriate person. However, if they remain anonymous, then this may hamper our ability to investigate the concerns.

### **INVESTIGATION**

Philanthropy Australia will try to investigate the matter concerned as soon as is practicable. The person raising the concern will normally be contacted to confirm that this investigation is taking place. They may be requested to put their concerns in writing, or to attend as a witness during any stage of the investigation. If the person is requested to attend then they will normally be permitted to be accompanied by an appropriate support person.

Once a concern is raised and warrants investigation, it may not be able to be stopped if Philanthropy Australia thinks it needs to be progressed. Philanthropy Australia will handle the matter as sensitively as possible during the course of the investigation.

## **OUTCOME**

If possible, the person raising the issue will be informed of the outcome of the investigation, and of any action that is proposed to rectify any established malpractice.

## **DISSATISFIED**

If the person raising the issue is unhappy about the speed or conduct of the investigation, or the way in which the matter has been resolved, then they should confirm their concerns in writing.

## **PROTECTING YOU**

If the person raising the issue believes they are being subjected to a detriment by any person within the organisation as a result of raising concerns under this procedure, then they must immediately inform the CEO, Chair, or Vice Chair. Philanthropy Australia will then take appropriate action.

## **EXTERNAL AUTHORITIES**

There may be matters that cannot be dealt with internally. In that case, external authorities will need to become involved. If this is necessary, then we reserve the right to involve them without consent. We will not disclose the person raising the concern as the source of the information, unless agreed otherwise, or if the external authorities such as police compel us to disclose the source of the complaint. Philanthropy Australia will try to mitigate this where possible, but cannot guarantee it.

## **GOOD FAITH**

If Philanthropy Australia has good reason to believe that when a person invoked this procedure they did not do so in good faith (for example for malicious reasons, or to pursue a personal grudge against another employee) then this will constitute misconduct and may result in disciplinary action.