

## WHISTLEBLOWER PROTECTION POLICY

### Purpose

The purpose of this policy is to:

Define the function of whistleblowing in the context of Transparency International Australia's (TIA) work

- > Confirm the protections afforded to those that speak out against improper conduct within the organisation
- > Follow a transparent investigation and resolution process in relation to all disclosures made

### Scope

This policy applies to all TIA Board Members, employees, volunteers and interns.

This policy will also apply to the staff of affiliates, partner organisations, consultants and contractors where they do not have a whistleblower protection policy that meets TIA standards.

### Definitions

#### Whistleblower

In line with the *Transparency International Anti-Corruption Glossary* and for the purpose of this policy, whistleblowing is defined as, 'Making a disclosure in the public interest by an employee, director or external person, in an attempt to reveal neglect or abuses within the activities of an organisation, government body or company (or one of its business partners) that threaten public interest, its integrity and reputation.'

This policy applies to the disclosure of any concerns about corruption, bribery, fraud, financial misconduct, criminal breaches of policy or unethical behaviour within Transparency International Australia.

### Policy Statement

Whistleblowers play an invaluable role in exposing corruption, fraud and mismanagement, and ensuring a positive and healthy organisation.

TIA supports and encourages all those who are willing to speak up about corruption, criminal breaches of policy, bribery, fraud, financial misconduct or unethical behaviour, to disclose freely and without fear of reprisal. Retaliation against those making disclosures will not be tolerated. TIA is committed to ensuring that all disclosures or concerns are properly investigated through appropriate internal or external channels. TIA is also committed to taking appropriate action to deal with and remedy all issues or problems identified as a result of concerns.

## Process

### Reporting

Any person covered by this policy who has a concern about possible corruption, bribery, fraud, financial misconduct, criminal breaches of policy or unethical behaviour within TIA or TIA programs, should report it as soon as practicable, to a person in a position of appropriate responsibility in the organisation, whom they trust.

Often that person may be their supervisor, or the Chief Executive Officer. However, if the concern relates to conduct of the Chief Executive Officer or the Manager Finance and Administration it should be raised directly with the Chair of the Board, or with the Chair of the Finance & Risk Committee.

If the concern relates to conduct of a Board Member, it should be raised directly with the Chair; or with another Board Member whom the staff member trusts.

### Confidentiality and Support

As much as is possible, concerns will be handled confidentially and on a 'need to know' basis. Persons raising concerns should also act with appropriate discretion, to help ensure that concerns can be appropriately investigated and acted upon. Where confidentiality is not possible or not practical to maintain, the staff/officeholders responsible for the organisation's response will discuss this with the person raising the concern, to establish the best way to proceed.

TIA will appoint a support person, agreed with the person raising the concern, to ensure that their welfare is taken into account in all decisions in how the concerns are handled. The support person will also work with the person raising the concern to identify any other support required and where appropriate and agreed, facilitate or coordinate the additional support.

TIA is committed to ensuring that the victimisation of whistleblowers does not occur, but if it does, then TIA recognises its responsibility to redress this. In line with TIA's Anti-Bullying and Harassment and Equal Opportunity and Anti-Discrimination policies, any person who feels that they have suffered adverse action as a result of raising a concern is encouraged to report this matter internally to a person of responsibility whom they trust. Notwithstanding, they may prefer to seek advice or redress via the Fair Work Ombudsman.

### Investigation Protocol

Investigations will be carried out promptly and professionally, with due consideration of the interests of any person raising concerns, as well as other employees and organisation members. For more detail, see the Standard Operating Procedures for Investigation and Reporting of Misconduct.

Persons, who have raised a concern, will receive an acknowledgement of receipt, and be kept informed, as necessary and appropriate for the particular circumstances, as to the action being taken in response to the concern – as well as final outcomes.

Where the person who has raised a concern is not satisfied with the process of investigation or the response to the outcome of the investigation, they may lodge a dispute in line with TIA's Grievance Policy. Notwithstanding, TIA recognises and respects that the person may prefer to take their complaint to an external mediator or arbitrator for resolution.

TIA may be required to report allegations of fraud or corruption to external parties before they are investigated.

## Responsible Reporting

This policy is to ensure support and protection is provided to a TIA Board Member, employee, volunteer or intern who raises an honest concern, on reasonable grounds. This includes any reasonable suspicion of a problem, even if mistaken. However, it does not protect any person who provides knowingly false or misleading information; and cannot be used by a person involved in wrongdoing to avoid the consequences of that wrongdoing, by self-reporting it.

TIA also encourages any employee, volunteer or intern with a workplace-based complaint or conflict – with management or with other staff or workers – to seek to resolve this in the most constructive way available. Even though a complaint or problem may not involve corruption, bribery, fraud, financial misconduct, criminal breaches of policy or unethical behaviour, and may not trigger this policy, TIA will still ensure it is acted on and resolved in a fair and appropriate way.

## Related Documents

This policy should be read in conjunction with:

- > Complaints Handling Policy
- > Code of Conduct
- > Anti-Fraud and Anti-Corruption Policy
- > Child Protection Policy
- > EEO and Anti-Discrimination Policy
- > Bullying and Harassment Prevention Policy
- > Standard Operating Procedures for the Investigation and Reporting of Misconduct.

## Effective Date and Review

<b>Title</b>	Whistleblower Protection Policy
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