



POLICY: WHISTLEBLOWER PROTECTION

OVERVIEW

Whistleblowing can be an effective way of uncovering fraud and other misconduct which may not be identified by internal or external controls within an organisation. The St Vincent de Paul Society National Council of Australia Inc. ('the Society') is committed to the principles of transparency and accountability and views whistleblowing as an opportunity to reflect upon organisational procedures and promote an ethical culture.

PURPOSE

The purpose of the Whistleblower Protection Policy is to help directors, officers, members, volunteer members and employees of the Society to identify any misconduct that may not be discovered unless there is a safe and secure means of disclosure.

The Society's Policy is prepared with the intention of addressing the following aims:

- to encourage disclosures of wrongdoing;
- to help deter wrongdoing, in line with our organisation's risk management and governance framework;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis;
- to provide transparency around our organisation's framework for receiving, handling and investigating disclosures;
- to support our organisation's values, code of conduct and/or ethics policy;
- to support our organisation's long-term sustainability and reputation; and
- to meet our organisation's legal and regulatory obligations.

DEFINITIONS

Chief Executive Officer:	The person employed as the Chief Executive Officer to the St Vincent de Paul Society National Council of Australia Inc.
Confidentiality:	In this context is when one's identity is protected to prevent harm to them. In the case of a whistleblower, their identity may be known to those receiving and investigating the report but is protected from the broader organisation and the public.
Detrimental conduct:	Conduct, or a threat to engage in conduct that causes detriment to a discloser.
Disclosable matter:	Information to which the whistleblower protections apply.
Discloser:	An individual who discloses wrongdoing or is an eligible whistleblower.
Disclosure:	A disclosure of information relating to wrongdoing or a disclosable matter.
Disclosures qualifying for protection:	Disclosures of tax matters are referred to as 'disclosures qualifying for protection'.
Eligible whistleblower:	An individual to whom the whistleblower protections apply as described below.

Emergency disclosure:	The disclosure of information to a journalist or parliamentarian, where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.
Personal information:	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether: <ul style="list-style-type: none"> • true or not; and • recorded in a material form such as a physical or digital document.
Personal work-related grievance:	A disclosure that relates to the discloser's current or former employment, which has implications for the discloser personally, but does not: <ul style="list-style-type: none"> • have any other significant implications for the organisation (or another organisation); or • relate to conduct, or alleged conduct, about a disclosable matter.
Public interest disclosure:	The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must also meet the following criteria to qualify: <ol style="list-style-type: none"> a) At least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation. b) The discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure. c) The discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. d) Before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made that: <ol style="list-style-type: none"> i) includes sufficient information to identify the previous disclosure; and ii) states that the discloser intends to make a public interest disclosure.
Whistleblower:	A person who has made a disclosure in keeping with this Policy and the nature of the disclosure qualifies for protection under the Corporations Act 2001 .
Whistleblower Protection Officer (WPO):	Is the Chief Executive Officer or in the case of a complaint against / notification involving the Chief Executive Officer, the National Council Deputy President.

ROLES AND RESPONSIBILITIES: WHISTLEBLOWER PROTECTION OFFICER (WPO)

The Chief Executive Officer is the National Council's primary WPO. The responsibilities of the WPO include:

- Implementing the Society's Whistleblower Protection Policy.
- Initial response to an accusation of wrongdoing.
- Ensuring the protection and/or anonymity of the discloser, where possible.
- Conducting or assisting in investigations into alleged wrongdoings.
- Informing the discloser of the progress and outcomes of investigations.
- Ensuring to the best of their ability that disclosers do not suffer any retaliation or negative consequences from the employer or any National Council members or employees.
- Providing support and referrals for both disclosers and those accused of wrongdoing.

The Society will ensure that all people associated with the organisation know who the designated WPO is and the contact details of the WPO.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

POLICY

Under this policy a 'whistleblower' is defined as:

2. A person who holds or has held any of the following positions in relation to the organisation:
 - a) a director or member or employee (current or former) whether permanent, part-time, fixed-term or temporary.
 - b) an intern, secondee or volunteer.
 - c) a supplier of services or goods to the organisation (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners).
 - d) an associate of the Society; usually a person with whom the Society acts in concert.
 - e) a relative, dependant or spouse of an individual listed in (a) to (c); e.g. relatives, dependants or a spouse of current and former members, volunteer members and employees, contractors, consultants, service providers, suppliers and business partners.
3. A discloser will qualify for protection as a whistleblower under the **Corporations Act 2001** if they are an eligible whistleblower in relation to the Society, *and*:
 - a) they have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' or to ASIC, APRA or another Commonwealth body prescribed by regulation; or
 - b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the **Corporations Act 2001**; or
 - c) they have made an 'emergency disclosure' or 'public interest disclosure'.

Scope of the policy

Disclosures that are not about disclosable matters do not qualify for protection under the **Corporations Act 2001** (or the **Tax Administration Act 1953**, where relevant). Such disclosures may be protected under other legislation, such as the **Fair Work Act 2009**.

Disclosable matters

Matters that qualify for protection under the **Corporations Act 2001** are 'disclosable matters'. Disclosable matters involve information that the discloser has reasonable grounds to suspect misconduct, improper conduct or an illegality, in relation to the Society, or a related body corporate of the Society.

The Society considers the following potential disclosable matters are descriptive examples only and should not be taken as a definitive listing of disclosable matters:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

Disclosable matters include conduct that may not involve a contravention of law. Information that indicates a significant risk to public safety or the stability of/or confidence in the Society's financial system is also a disclosable matter.

A discloser can still qualify for protection even if the disclosure they make turns out to be incorrect (i.e. if the issue of disclosure turns out to be wrong but made in good faith then the whistleblower is still entitled to protection under the legislation).

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

Personal work-related grievances

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the **Corporations Act 2001**.

Examples of a personal work-related grievance include:

- a) an interpersonal conflict between the discloser and another employee;
- b) a decision that does not involve a breach of workplace laws;
- c) a decision about the engagement, transfer or promotion of the discloser;
- d) a decision about the terms and conditions of engagement of the discloser; or
- e) a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

However, a personal work-related grievance may still qualify for protection if:

- a) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- b) the organisation has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- c) the discloser suffers from or is threatened with detriment for making a disclosure; or
- d) the discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the **Corporations Act 2001**.

Employees of the Society can internally raise work-related grievances and other types of issues or concerns not covered by this Policy, through the Society's (*add relevant policies and insert hyperlink*).

INFORMATION FOR WHISTLEBLOWERS

Who can receive a disclosure

The following persons or institutions can receive a disclosure.

1. Eligible recipients (those who can receive disclosures that qualify for protection)

An 'eligible recipient' is someone who receives disclosures that qualify for protection and may include:

- a) an officer or senior manager of the organisation or related body corporate;
- b) the internal or external auditor (including a member of an audit team conducting an audit) or actuary of the organisation or related body corporate; and
- c) a person authorised by the organisation to receive disclosures that may qualify for protection.

A discloser must make a disclosure directly to one of the Society's eligible recipients in order to be able to qualify for protection as a whistleblower under the **Corporations Act 2001** (or the **Tax Administration Act 1953**, where relevant).

2. Legal practitioners

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the **Corporations Act 2001** are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter').

3. Regulatory bodies and other external parties

Disclosures of information relating to disclosable matters can be made to ASIC, APRA or another Commonwealth body prescribed by regulation, and will qualify for protection under the **Corporations Act 2001**.

Employees can access more information on making an external disclosure by accessing the ASIC [How ASIC handles whistleblower reports](#).

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

4. Public interest disclosures and emergency disclosures

Disclosures can be made to a journalist or parliamentarian under certain circumstances and qualify for protection.

It is important for the discloser to understand the criteria for making a public interest or emergency disclosure.

The disclosure must have previously been made to ASIC, APRA or a prescribed body, and the discloser must notify this body that they intend to make a public interest disclosure.

In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

A discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

The full criteria for a 'public interest disclosure' and an 'emergency disclosure' are as follows –

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - includes sufficient information to identify the previous disclosure; and
 - states that the discloser intends to make a public interest disclosure.

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the discloser has given written notice to the body to which the previous disclosure was made that:
 - includes sufficient information to identify the previous disclosure;
 - states that the discloser intends to make an emergency disclosure; and
 - the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

How to make a disclosure

1. Members, volunteers and employees of the Society

Members, volunteers and employees of the Society can make disclosures both internally and externally.

Options available to disclosers are:

- information on how to contact the Society's eligible recipients in person or through post or email; and
- the telephone number for the Society's internal whistleblower hotline, which will be highlighted on the Society's website. The number is **(02) 6202 1213** and will be answered by the Executive Officer who will refer the caller to the Chief Executive Officer or, where required, to the Deputy President.
The direct number for the Chief Executive Officer is 0419 417 563.
- Anonymous disclosures

Disclosures can be made anonymously and still be protected under the **Corporations Act 2001**.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

A discloser who wishes to remain anonymous should maintain ongoing two-way communication with the organisation, so the organisation can ask follow-up questions or provide feedback.

If a disclosure comes from an email address from which the person's identity cannot be determined, and the discloser does not identify themselves in the email, the Society will treat it as an anonymous disclosure.

The Society will use the following measures/mechanisms for protecting anonymity:

- communication with disclosers will be through anonymous telephone hotlines and anonymised email addresses; and
- a discloser may adopt a pseudonym for the purpose of their disclosure — this may be appropriate in circumstances where the discloser's identity is known to their supervisor, the whistleblower protection officer, or equivalent, but the discloser prefers not to disclose their identity to others.

Legal protections for disclosers

Protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the **Corporations Act 2001**.

1. Identity protection (confidentiality)

The Society has a legal obligation to protect the confidentiality of a discloser's identity.

A person cannot disclose the identity of a discloser or information that is likely to lead to the identification of the discloser (which they have obtained directly or indirectly because the discloser made a disclosure that qualifies for protection).

An exception to this confidentiality obligation is if a person discloses the identity of the discloser:

- a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the **Australian Federal Police Act 1979**);
- b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the **Corporations Act 2001**);
- c) to a person or body prescribed by regulations; or
- d) with the consent of the discloser.

A person can disclose the information contained in a disclosure with or without the discloser's consent if:

- a) the information does not include the discloser's identity;
- b) the organisation has taken all reasonable steps to reduce the risk that the discloser will be identified from the information (e.g. removing the discloser's name, position title and other identifying details); and
- c) it is reasonably necessary for investigating the issues raised in the disclosure.

It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser, outside the exceptions detailed above.

A discloser can lodge a complaint with the Society about a breach of confidentiality, by following the Society's policy regarding (*hyperlink to be inserted*).

A discloser may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

2. Protection from detrimental acts or omissions

The Society or any individual must not engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:

- a) they believe or suspect that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- b) the belief or suspicion is the reason, or part of the reason, for the conduct.

In addition, the Society (or any individual) cannot make a threat to cause detriment to a discloser in relation to a disclosure. A threat may be express or implied, conditional or unconditional.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

Examples of detrimental conduct as a consequence of a person's disclosure against a member, employee or volunteer that are prohibited under the law include:

- dismissal;
- harm or injury to a person, including psychological harm;
- alteration of their position or duties to his/her disadvantage;
- discrimination, harassment or intimidation;
- damage to the person's property;
- damage to the person's reputation; or
- damage to a person's business or financial position.

Examples of actions *that are not* detrimental conduct include the following:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office or work area to prevent them from detriment); and
- managing a discloser's unsatisfactory work performance, if the action is in line with the organisation's performance management framework.

The Society will strive to ensure that a discloser understands the reason for any administrative or management action.

Protection from detrimental acts or omissions

The Society will implement the following measures and mechanisms to protect the discloser from detrimental acts or omissions:

- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
- support services (including counselling or other professional or legal services) that are available to disclosers;
- strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- actions for protecting a discloser from risk of detriment - for example, the organisation could allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other members, employees and volunteers involved in the disclosable matter;
- processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser;
- procedures on how a discloser can lodge a complaint if they have suffered detriment, and the actions the organisation may take in response to such complaints (e.g. the complaint could be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the board or audit or risk committee); and
- interventions for protecting a discloser if detriment has already occurred - for example, the organisation could investigate and address the detrimental conduct, such as by taking disciplinary action, or the organisation could allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

3. Civil, criminal and administrative liability protection

A discloser is protected from any of the following in relation to their disclosure:

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

- a) civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure); and
- c) administrative liability (e.g. disciplinary action for making the disclosure).

These protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

Support and practical protection for disclosers Identity protection (confidentiality)

The Society will implement the following measures and mechanisms to protect the confidentiality of a discloser's identity:

1. Reducing the risk that the discloser will be identified from the information contained in a disclosure including:
 - all personal information or reference to the discloser witnessing an event will be redacted;
 - the discloser will be referred to in a gender-neutral context;
 - where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
 - disclosures will be handled and investigated by qualified persons.
2. Secure record-keeping and information-sharing processes including:
 - all paper and electronic documents and other materials relating to disclosures will be stored securely;
 - access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
 - only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
 - communications and documents relating to the investigation of a disclosure will not to be sent to an email address or to a printer that can be accessed by other staff; and
 - each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

Compensation and other remedies

A discloser (or any other director, member, employee, volunteer or person) can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage or injury because of a disclosure; and
- b) the Society failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Disclosers to seek independent legal advice in relation to compensation and other remedies.

PROCEDURAL PROCESSES

Handling and investigating a disclosure

The Society will take the following steps after it receives a disclosure:

- all disclosures will be considered seriously;
- an internal investigation of the facts of the case will be conducted by the WPO to verify the details of the allegation(s) made and to determine whether further action is to be taken;
- an internal investigation will be undertaken where the matter does not necessitate a police investigation (i.e. it does not involve a criminal matter); and
- when a report is received, the WPO will use their discretion to decide whether legal advice is required.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

The Society will assess each disclosure to determine whether it qualifies for protection and whether a formal, in-depth investigation is required.

Investigating a disclosure

The Society will take the steps detailed below:

1. The Eligible Recipient receives the complaint and officially records and then directs the matter to the Whistleblower Protection Officer outlining any alleged misconduct. The person/s who are the subject of the complaint will then be notified, so that they may present their case.
2. In consultation with the WPO and relevant managers, terms of reference and an investigation plan will be prepared, which will include:
 - the key issues to be investigated;
 - the scale of the investigation, in proportion to the alleged wrongdoing; and
 - allocation of resources.

The investigation will normally commence immediately, however the process may vary depending on the nature of the disclosure.

The Society may not be able to undertake an investigation if it is not able to contact the discloser.

Keeping a discloser informed

A discloser will be provided with regular updates if the discloser can be contacted (including through anonymous channels). The frequency and timeframe may vary depending on the nature of the disclosure.

The Society will acknowledge a discloser after receiving their disclosure.

In addition, the Society will provide updates to a discloser during the key stages, such as:

- when the investigation process has begun;
- while the investigation is in progress; and
- after the investigation has been finalised.

How investigation findings will be addressed by the Society

Findings from an investigation will be documented and reported to those responsible for oversight of the policy, while preserving confidentiality.

Throughout the course of the investigation conversations, interviews, communications and relevant documents will be recorded and stored. Upon completion, an investigation report will be prepared and filed.

The investigation report will include:

- the allegations;
- a statement of facts and the corroborating evidence;
- conclusions reached by the investigation;
- any recommended amendments to organisational policy to avoid future wrongdoing.

All documents relating to whistleblowing reports and investigations will be kept securely and confidentially, and access to documents granted only when necessary.

Disclosers will receive information on the outcome of their disclosure at the end of the investigation, as appropriate.

The method for documenting the findings will depend on the nature of the disclosure. There may be circumstances in which it may not be appropriate to provide details of the outcome to the discloser.

Ensuring fair treatment of individuals mentioned in a disclosure

The Society will ensure the fair treatment of our members, volunteer members and employees, who are mentioned in a disclosure that qualifies for protection, including those who are the subject of a disclosure.

The Society will implement the following measures and mechanisms to ensure the fair treatment of members, employees and volunteers mentioned in a disclosure that qualifies for protection:

- Disclosures will be handled confidentially.
- Each disclosure will be assessed and may be the subject of an investigation.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

- The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported.
- When an investigation needs to be undertaken, the process will be objective, fair and independent.
- A member, employee or volunteer who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken—for example, if the disclosure will be the subject of an investigation.
- A member, employee or volunteer who is the subject of a disclosure may contact the organisation’s support services (e.g. counselling).

Right of Review

After having been informed of the outcome of an investigation, the person who has raised the concern may further refer the matter to the National President of the Society if:

- it is considered that retaliatory action has been taken; or
- it can be demonstrated that there is a genuine and reasonable concern that the disclosure has not been adequately dealt with.

The National President may take any further steps as she or he determines in the circumstances are appropriate or decide not to take any further action.

Accessibility of this policy

1. Within the organisation

This policy will be made available to all directors, members, employees and volunteers of the Society. It will be made accessible and will be communicated in the following ways:

- holding briefing sessions and/or smaller team meetings;
- posting the policy on the intranet or other communication platform;
- posting information on staff noticeboards;
- setting out the policy in the employee handbook; and
- incorporating the policy in induction information packs and training for new starters.

The Society will inform and educate its directors, members, employees and volunteers of the whistleblower policy, procedures for reporting, and the protections available to them in order to facilitate a safe environment in which concerns of misconduct may be voiced without reprisal.

Staff involved in the management of whistleblower reports will receive appropriate training in dealing with reports, investigations, and supporting disclosers and those who are the subject of allegations.

2. Outside the organisation

To ensure disclosers outside the organisation can access the Society’s Whistleblower Protection Policy, the Policy will be available on the Society’s public website.

REVIEWING AND UPDATING THIS POLICY

The Society will review its Whistleblower Protection Policy, processes and procedures every two years, ensuring that they reflect the most up-to-date legal and corporate governance requirements.

Any changes made to the Policy will be communicated to all members, volunteer members and employees.

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	

DOCUMENT INFORMATION

TITLE	Whistleblower Protection Policy
DOCUMENT TYPE	Policy
DOCUMENT NUMBER	27
AUDIENCE	National Council directors and National Secretariate employees and volunteers
CATEGORY	Governance
LEGISLATION	<ul style="list-style-type: none"> • Australian Federal Police Act 1979 • Corporations Act 2001 • Fair Work Act 2009 • Tax Administration Act 1953
RELATED DOCUMENTS	N/A
EFFECTIVE DATE	4 September 2020
REVIEW DATE	4 September 2022
RESPONSIBLE OFFICER	National Council Chief Executive Officer
APPROVER	National Council
ENQUIRIES	Toby oConnor

Applies to: National Council, National Council Secretariate	Issue Date: 4 September 2020
Document Owner: National Council CEO	