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| Internal document name: | Whistle-blower PolicyP 4 20 Code reference 9.2.2  |
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**Purpose**

Reledev Australia is committed to accountability and transparency. The purpose of this policy is to provide a supportive work relationship environment where misconduct within, or by Reledev Australia, can be raised without fear of retribution.

This is achieved by:

* Encouraging the reporting of serious misconduct
* Providing protected misconduct reporting alternatives to remove inhibitions that may impede such disclosures
* Establishing procedures that enable protection for those that make serious misconduct disclosures
* Independent internal inquiry/investigation of disclosures made
* Resolution of the issue(s) identified

This policy is guided by UNICEF Australia’s Whistle-blower Protection Policy

**Scope**

This policy applies to all stakeholders, including but not limited to: directors, employees, volunteers, contractors and consultants. It also applies to a person or organisation who has a relationship with Reledev Australia who reports serious misconduct within or by a Reledev Australia employee/s.

**Definitions**

**Whistleblowing is**: a disclosure of actual or suspected misconduct in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.

**A whistle-blower is**: A person who reports serious misconduct in accordance with this policy.

**Descriptions of misconduct for this policy**

Misconduct includes behaviour that:

* Is fraudulent, corrupt or illegal
* Is unethical, such as acting dishonestly; altering company records; wilfully making false entries in official records; engaging in questionable accounting practices; or wilfully breaching Reledev Australia’s code of conduct and of the ACFID Code of Conduct
* Is potentially damaging to Reledev Australia, such as maladministration
* Is seriously/potentially harmful to a Reledev Australia employee or volunteer, such as deliberate unsafe work practice or wilful disregard to the safety of others in the workplace
* May cause serious financial or non-financial loss to Reledev Australia; or damage its reputation; or be otherwise seriously contrary to Reledev Australia’s Whistleblowing policy
* Involves any other kind of serious impropriety including retaliatory action against a whistle-blower for having made a wrongdoing disclosure

**Policy Statement**

Reledev Australia is committed to the highest standards of legal, ethical and moral behaviour. It recognises that people who have a working relationship with Reledev Australia are often the first to realise there may be concerns. When a person makes such a disclosure they are entitled to expect that:

* Their identity remains confidential at all times to the extent permitted by law or is practical in the circumstances
* They will be protected from reprisal, harassment or victimisation for making the report
* Should retaliation occur for having made the disclosure, then Reledev Australia will treat it as serious wrongdoing under this policy.

Therefore, there should be no fear of appearing disloyal or concern about being victimised or the subject of other reprisals, about reporting this misconduct. No person will be personally disadvantaged for reporting a wrongdoing. Not only may this misconduct be illegal, but it may directly oppose the values and mission of Reledev Australia.

**Implementation of the policy**

Reledev Australia is committed to maintaining an environment where legitimate concerns are able to be reported without fear of retaliatory action or retribution. This commitment is enacted through, training, information sharing and clear procedures for reporting.

**Training**

All Reledev Australia staff will be made aware of this policy and their responsibilities to report wrongdoing to the Manager or to a Director of Reledev’s Board. It is the responsibility of the Manager to ensure all staff are adequately trained in understanding, identifying and (where possible) mitigating any activity that may breach the definitions of fraudulent or corrupt behaviour.

Reledev stakeholders will be notified of the whistle-blower policy via the Reledev Australia website.

**Obligations**

A report must be made, in good faith, in writing and as thorough as possible. False or malicious allegations may result in disciplinary actions.

The whistle-blower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Even though a whistle-blower may be implicated in the wrongdoing they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

It is important to note that making a report may not protect the whistle-blower from the consequences flowing from involvement in the wrongdoing itself. The level of a person’s liability may be considered when deciding upon disciplinary action. Such considerations may include their active cooperation in the investigation, an admission and remorse.

The whistleblower must maintain confidentiality regarding the issue and refrain from discussing the matter except with persons authorised to carry out the investigation.

**Anonymity**

Should the whistle-blower wish to remain anonymous this request will be duly honoured but limited in so far as it may be overridden by due process of law.

**Reporting Procedures**

A whistle-blower should report in writing instances or suspicions of misconduct to Reledev Australia’s manager as the first point of contact, but where it is not possible or appropriate to report suspicion of misconduct to the manager the report should be raised directly with the chairperson of the Board.

If a report is lodged with the Reledev manager, the manager must also contact the chairperson of the Board. Both parties will agree on the appointment of an appropriate delegate, who is not implicated in the report, to lead the investigation.

If the report is lodged with chairperson of the Board, they will contact another director on the Board in order to agree on the appointment of an appropriate investigator, who is not implicated in the report, to lead the investigation.

The individual who leads the investigation may also be a qualified external investigator independent of Reledev Australia where considered necessary.

Retaliatory action will not be taken against the person who made the disclosure.

Once the whistle-blower investigator is appointed, the Board of Directors should be notified with details regarding the process of the investigation to be undertaken.

The investigator must

* have direct, unfettered access to independent financial, legal and operational information as required.
* have a direct line of reporting to the relevant contact point.
* keep the contact point regularly informed of the investigation progress.
* inform the whistle-blower of the progress and outcomes of the inquiry/investigation, subject to considerations of privacy of those against whom the allegations have been made.

The investigator must be an independent third party to those directly responsible for the case in question. The investigator is authorised to apply powers granted by the Board of Directors.

The investigator may second the expertise of other officers in Reledev Australia to assist in the investigation and may seek the advice of internal or external experts as required.

**Investigation outcomes/report**

At the end of the investigation a report will be completed. This report will include:

* the allegations
* a statement of all relevant findings, facts and the evidence relied upon in reaching any conclusions
* the conclusions reached including the repercussions to affected parties and impact on the organisation.
* Recommendations based on these conclusions to address any wrongdoing identified and other matters arising during the investigation.

**Related documents**

Reledev Fraud Risk Management Policy

Reledev Complaints Policy and Procedures

Reledev Professional Conduct Guidelines