

WHISTLEBLOWER POLICY

Effective Date

JULY 2018

This policy or procedure applies to:

All Directors, Employees, Volunteers, Donors, Clients and any other person who deals with Guide Dogs Victoria.

1. General

Guide Dogs Victoria is committed to the highest standards of legal, ethical and moral behaviour, and it will not tolerate unethical, unlawful or undesirable conduct. As such, Guide Dogs Victoria has developed a range of Policies and Codes that promote a culture of honesty and ethical behaviour within our organisation. Guide Dogs Victoria encourages any person to report any breaches of its Policies and Codes or regulations or laws in good faith, and in an environment that is free from victimisation.

2. Purpose of this Policy

The purpose of this policy is to:

- Provide a framework for effectively reporting and investigating reportable conduct;
- Ensure our people feel confident about reporting reportable conduct and that they are protected against reprisals; and
- To provide an alternate avenue for reporting matters that may cause loss or reputational damage to Guide Dogs Victoria.

This policy complements the Grievance Policy and is aligned to the Australian Standard on Whistleblower Protection Programs.

3. Definitions

Employees includes all permanent and casual employees, labour hire and contractors.

Volunteers includes all Directors of the Board and members of the Consumer Advisory Council.

Whistleblowing is the disclosure by or for a witness, of actual or suspected reportable conduct at Guide Dogs Victoria that reveals fraud, corruption, illegal activities, gross mismanagement or other serious wrongdoing.

Reportable Conduct is conduct that in the view of the Whistleblower acting in good faith may be:

- A breach of regulations or laws;
- A breach of Guide Dogs Victoria's Policies or Codes (including bullying, harassment, sexual harassment and discrimination policies);
- Dishonest or corrupt behaviour;
- Fraudulent activity;
- Illegal activity (including theft, drug sale/use, violence or threatened violence and criminal damage);
- An impediment to internal or external audit processes;
- Improper behaviour relating to accounting, internal controls or administrative matters;
- An activity that poses a substantial risk to the environment;
- Serious impropriety;
- Conduct endangering health and safety;
- Substantial mismanagement of Guide Dogs Victoria's resources;
- Conduct that is detrimental to Guide Dogs Victoria's financial position or reputation; or
- Any concealment of reportable conduct.

4. Commitment

The Board and Senior Leadership Team of Guide Dogs Victoria encourage all staff and all people associated with Guide Dogs Victoria to report Reportable Conduct. All people should feel confident about reporting without the fear of reprisal. The Board and Senior Leadership Team are committed to protecting and supporting Whistleblowers where they act in good faith in reporting reportable conduct.

5. When to Use the Whistleblower Policy

Guide Dogs Victoria has in place a Grievance and Dispute Resolution Policy which governs how issues and concerns are managed and resolved internally within the workplace. In the first instance, our people are encouraged to raise and resolve concerns using the Grievance and Dispute Resolution Policy.

However Guide Dogs Victoria recognises that the Grievance and Dispute Resolution Policy may not be an adequate mechanism for reporting wrongdoing in all circumstances, such as:

- Where the individual who may have engaged in Reportable Conduct is not a staff member;
- Where the Whistleblower reasonably believes that they may be victimised if they use the Grievance and Disputes process ;
- Where the reportable conduct may involve the Whistleblower's manager or senior personnel at Guide Dogs Victoria who they deal with; or
- Where the Whistleblower prefers to make a report anonymously.

Guide Dogs Victoria's Whistleblower Policy may be used in those circumstances to report reportable conduct.

6. Reporting Reportable Conduct

Any person who has reasonable grounds to suspect wrongdoing at Guide Dogs Victoria can report Reportable Conduct either in person or in writing to:

Guide Dogs Victoria's Appointed External Whistleblower Investigations Officer:

Lander & Rogers Lawyers
Level 12, 600 Bourke Street
Melbourne Victoria 3000
(03) 9269 9802
www.landers.com.au

Reports can be made anonymously or confidentially. Anyone reporting conduct under Guide Dogs Victoria's Whistleblower Policy must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a wrongdoing. Reports of Reportable Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to the extent permissible under the law.

7. Investigating Wrongdoing

The investigations process will vary depending on the precise nature of the conduct being investigated and the amount of information that has been provided in the report.

The externally appointed Whistleblower Investigations Officer from Lander & Rogers

Lawyers will determine who is the most appropriate person to communicate a report to within Guide Dogs Victoria (for example, the GM People and Culture, the CEO or the Chairman), and in conjunction with that person, determine the most appropriate method of undertaking an investigation, and whether an investigation will be conducted internally or by an externally appointed organisation.

All investigations under this Whistleblower's Policy will be conducted in a manner that is confidential, fair and objective and affords natural justice to all people involved. Reports will not be investigated by anyone who is implicated in the concern being raised. For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. Any anonymous report should provide as much detail as possible so as not to compromise the ability to fully investigate the allegations being made. Where practicable, an update should be provided to the person who has raised the concern. Whistleblower reports will be promptly investigated and appropriate corrective action taken if warranted by the investigation.

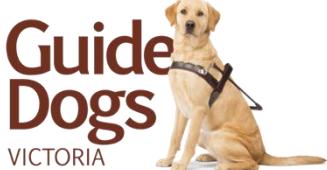
8. Whistleblower Protection

No Whistleblower who in good faith reports an issue under the Whistleblower Policy shall suffer victimisation, retaliation or adverse employment consequences by reason of such reporting, provided that they themselves have not engaged in Reportable Conduct. Any employee who victimises someone who has made a report in good faith under this Whistleblower Policy may be subject to disciplinary action.

9. Whistleblower Protection Officer

Guide Dogs Victoria provides for the appointment of a Whistleblower Protection Officer who is responsible for protecting the Whistleblower from being victimised as a result of making a report. Any person who reports reportable conduct can seek advice from the Whistleblower Protection Officer prior to or after making a report. The Whistleblower Protection Officer can protect the Whistleblower in a number of ways, including, but not limited to, the following:

- Ensuring confidentiality in the investigation;
- Protecting, as far as legally possible, the person's identity;
- Offering a staff member leave of absence while a matter is investigated;



Policy Area: People & Culture Department
Document No: HR POL000
Version No: 2.0
Next Revision Date: July 2021

- Offering assistance through Guide Dogs Victoria's Employee Assistance Program (EAP); or
- Relocating a staff member or other personnel to a different work group or department.

The GM People & Culture is the Whistleblower Protection Officer.

10. Unsubstantiated Allegations

Any allegation contained in a report made under this policy that is unsubstantiated, which proves to have been made maliciously or was knowingly false (**Improper Report**) will be taken seriously. Disciplinary action may be taken against any individual who makes an Improper Report. No action will be taken against a Whistleblower who makes a report under this policy where the report is made in good faith but where no wrongdoing was identified.

11. Responsibilities

The **Chief Executive Officer or Chairperson** (in the case of a Board member or CEO being reporting) is responsible for:

- Reviewing any allegations
- Authorising an investigation of the report

The **GM People and Culture** is responsible for:

- Acting as the Whistleblower Protection Officer

General Managers, Managers and Team Leaders are responsible for:

- Communicating and reinforcing the Whistleblower Policy
- Refer matter to the Whistleblower Protection Officer

Employees and Volunteers are responsible for:

- Adhering to the Whistleblower Policy



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12. Related Documents

Code of Conduct Policy
Grievance Policy