

# INF Australia WHISTLEBLOWER POLICY

Policy number:		Version:	2
Owner:	CEO	Approved on:	July 2018
Users:	All	Scheduled review date	July 2021

THIS POLICY COMPLIES WITH: ACFID CODE OF CONDUCT COMMITMENT 7.3

RELATED INF AUSTRALIA POLICIES: INF AUSTRALIA CODE OF CONDUCT; INF AUSTRALIA COMPLAINTS HANDLING POLICY; INF AUSTRALIA CHILD PROTECTION POLICY

RELATED INF AUSTRALIA PRACTICE DOCUMENTS:

## 1. INTRODUCTION

This policy is based on INF Australia's commitment to honesty, accountability and transparency. The purpose of this policy is to provide a supportive working environment where misconduct within or by INF Australia or our partners can be raised without fear of retribution.

This is achieved by:

- encouraging the reporting of serious misconduct,
- providing protected channels for reporting,
- establishing procedures that enable: protection for those that make serious misconduct disclosures, independent internal inquiry/investigation of disclosures made, and resolution of the issue(s) identified.

## 2. APPLICATION

This policy applies to any stakeholders of INF Australia, including directors, employees, volunteers, partners, beneficiaries, supporters, contractors and consultants and members of the public. It also applies to a person or organisation with a relationship with INF Australia who reports serious misconduct within or by INF Australia employees or volunteers.

## 3. DEFINITIONS

### 3.1 Definitions for this policy

**Whistleblowing is:** The disclosure by or for a witness, 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.

### 3.2 Descriptions of misconduct for this policy includes behaviour that:

- is fraudulent or corrupt [as defined under the INF Australia Fraud Policy]
- is 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 INF Australia's code of conduct or the ACFID Code of Conduct
- is potentially damaging to INF Australia, such as maladministration
- is seriously harmful or potentially seriously harmful to an INF 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 INF Australia; or damage its reputation; or be otherwise seriously contrary to INF Australia's Whistle-blowing policy
- involves any other kind of serious impropriety including retaliatory action against a whistle-blower for having made a wrongdoing disclosure.

## 4. POLICY

### 4.1 COMMENTS

INF Australia strives to be honest, trustworthy and transparent and we are committed to making what we do consistent with what we say. We have an open door policy and welcome questions, comments or suggestions. These should be directed to:

Office Manager, INF Australia, PO Box 5400, West Chatswood, NSW 1515

Email: [ausoffice@au.inf.org](mailto:ausoffice@au.inf.org)

Telephone: [02] 9411 1195

If contact details are included, comments will be responded to.

### 4.2 Whistle blowing

INF Australia is committed to the highest standards of legal, ethical and moral behaviour. INF Australia recognises that people who have a working relationship with INF Australia are often the first to realise there may be concerns. However, for fear of appearing disloyal or concern about being victimised or the subject of other reprisals, they may be concerned about reporting this misconduct.

No person should be personally disadvantaged for reporting a wrongdoing. Not only may this misconduct be illegal, but it may directly oppose the values and mission of INF Australia.

INF Australia is committed to maintaining an environment where legitimate concerns are able to be reported without fear of retaliatory action or retribution.

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 INF Australia will treat it as serious wrongdoing under this Policy.

### 4.3 Whistle blowing in Nepal

The same standards of confidentiality, non-retaliation and investigation apply to good-faith whistleblowing from partners, volunteers or community members in Nepal.

A summary of this policy will be translated into Nepali language and shared with partners and members of the communities where INF Australia supported projects are implemented.

## 5. PROCEDURES

5.1 All INF Australia staff and volunteers will be made aware of this policy and their responsibilities to report wrongdoing to the CEO. It is the responsibility of the CEO 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 (as outlined in the INF Australia Fraud Policy).

5.2 All INF stakeholders will be notified of the Whistle-blower policy via the INF Australia website.

### REPORTING PROCEDURES

5.3 A whistle-blower should report instances of, or suspicions of misconduct to a Contact Point within the organisation. In the first instance this should be the INF Australia CEO ([ceo@au.inf.org](mailto:ceo@au.inf.org)). Reports must be made in good-faith and be as thorough as is possible. False or malicious allegations may result in disciplinary actions.

5.4 Where it is not possible or appropriate to report suspicion of misconduct to the CEO, reports should be raised directly to the Chair of the INF Australia Board ([chair@au.inf.org](mailto:chair@au.inf.org)).

5.5 Suspicion of a breach of the ACFID code of conduct can be made to ACFID ([code@acfid.asn.au](mailto:code@acfid.asn.au)). More information about the ACFID code can be found at [www.acfid.asn.au](http://www.acfid.asn.au).

5.6 If the report is lodged with the CEO, they will contact the Chair of the Board. Both parties will agree on the appointment of an appropriate person, who is not implicated in the report, to lead the investigation.

5.7 The individual who leads the investigation should be either a:

- qualified internal investigator who is independent of the area where the wrongdoing is alleged to have occurred, or
- a qualified external investigator independent of INF Australia where considered necessary.

5.8 The responsibilities of the appointed investigator include the assurance that action taken in response to the inquiry is appropriate to the circumstances and retaliatory action will not be taken against the person who made the disclosure.

5.9 Once the investigator is appointed, they will inform the Contact Point of the details and process of the investigation to be undertaken.

5.10 The investigator has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the relevant Contact Point, as may be required to satisfy the objectives of this Policy.

5.11 The Investigator must keep the Contact Point regularly informed of the investigation progress.

5.12 The Investigator is also responsible for keeping the Whistle-blower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom the allegations have been made.

5.13 The investigator must have internal independence of line management of the area affected by the wrongdoing disclosure. The internal investigator is authorised to apply the powers granted by the Finance & Risk Committee.

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

#### **5.14 Whistle-blower**

A person considering making a whistle-blower report is obliged to act in good faith and have reasonable grounds for believing the disclosure is reportable wrongdoing.

### **6. OBLIGATIONS**

A 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. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy. However active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary or other action.

## **REVISION HISTORY**

<b>Date</b>	<b>No</b>	<b>Summary of Changes</b>	<b>Section/s that changed</b>	<b>Authorised by:</b>
June 2015	1			
July 2018	2	Complete re-write, including whistleblowing from Nepal.	All	INFA Board