

WHISTLEBLOWING POLICY

Action on Poverty (AOP) is committed to the highest standards of legal, moral, ethical behaviour. We do not tolerate unethical, unlawful or undesirable conduct. This policy documents AOP's commitment to maintaining an environment in which employees; volunteers, partners and members of the public are able to report, without fear of retaliatory action, concerns about any serious instances of wrongdoing that they believe may be occurring in the name of AOP and/or its partners.

This policy complements the AOP Complaints Handling Policy and Procedures and provides an alternative means of reporting alleged or suspected wrongdoing where the usual channels appear to have failed or may be inappropriate.

Policy aims:

The policy aims to fulfil the following:

- Help detect and address wrongdoing and protect employees and members of the public who report (anonymously or not) actual or suspected wrongdoing;
- Help provide employees, volunteers, partners and any others, with a supportive work environment in which they feel able to raise issues of legitimate concern to AOP;
- Provide suitable avenues for the reporting of matters that may cause loss to AOP or AOP's reputation.

Definitions:

For the purpose of this policy, AOP defines Whistleblowing as:

"The deliberate, voluntary disclosure of individual or organisational wrongdoing by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an organisation that is within its ability to control."

Definitions of wrongdoing covered and for the purpose of this policy include those that are:

- Are dishonest, fraudulent or corrupt;
- Are illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of state or federal legislation;
- Are unethical such as dishonestly altering company records or engaging in questionable accounting practices or wilfully breaching AOP's Code of Conduct or other ethical statements;
- Are potentially damaging to AOP, such as unsafe work practices or substantial wasting of resources;
- May cause financial loss to AOP or damage its reputation or be otherwise detrimental to AOP's interests or involves any other kind of serious impropriety.

Standards:

Staff, volunteers, contractors and partners who are aware of possible wrongdoing have a responsibility to disclose that information.

Every claim of wrongdoing that is reported to AOP shall be investigated thoroughly, promptly, and in a confidential manner. The investigation will allow all parties involved in the complaint to have the opportunity to support their case and otherwise have a fair hearing. In addition, AOP will not tolerate retaliation against an employee for making a good faith complaint or enquiry to the Ethics Committee, Board and/or AOP Directors.

How to report wrongdoing:

Similar to making a complaint, a claim of wrongdoing can be brought to the attention of AOP in many different ways.

A claim should be marked “Confidential” and addressed to either:

CEO

Action on Poverty

PO Box 1206

North Sydney NSW 2059

OR

Action on Poverty Ethics Committee

PO Box 1206

North Sydney NSW 2059

Via email: info@actiononpoverty.org

Via telephone: 02 9906 3792

Via fax: 02 9436 4637

You are welcome to visit the AOP office in person in order to voice your claim. We are located at:

Action on Poverty

50 Miller St

North Sydney NSW 2060

Procedure for claims of wrongdoing to the Ethics Committee:

Any AOP general member, partner, beneficiary, board member or employee may bring a claim of wrongdoing before the Ethics Committee.

A claim will constitute a formal complaint made against any staff, board member, partner, partner organisation or general member of AOP.

All claims of wrongdoing reported to AOP remain confidential pending an investigation.

Supervisors or staff who receive complaints or who observe misconduct should (if appropriate) immediately inform the claim to their supervisor, the nominated governing body representative or a member of the AOP Ethics Committee in writing. AOP supports internal and external processes for safe reporting of wrongdoing (whistle blowing) that include: publicised points of contact; documented processes for investigation and prescribed timeframes for reporting. AOP advises that an employee is not required to inform to his or her supervisor if the supervisor is the individual who is the subject of the wrongdoing.

A general principle of AOP is that a person that is implicated in a claim of wrongdoing will not handle that specific complaint.

In the case of the AOP employees, if misconduct is established, AOP will discipline the offender.

Disciplinary action for a violation of this policy can range from verbal or written warnings up to and including immediate termination, depending upon the circumstances.

Confidentiality of whistleblower’s identity and whistleblowing reports:

If a person makes a report of alleged or suspected wrongdoing under this policy AOP will endeavour to protect that person’s identity from disclosure.

As a rule AOP will not disclose the name or identity of a person unless:

- The complainant making the report consents to the disclosure;
- The disclosure is required or authorised by law, and/or
- The disclosure is necessary to further the investigation.

Depending on the circumstances it may be necessary to disclose the fact and the substance of a report to the person who is the subject of the report. Although confidentiality is maintained in most circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.

AOP will take reasonable precautions to store any records relating to a report of wrongdoing securely and to permit access by authorised persons only.

Protection of whistleblowers:

AOP is committed to protecting and respecting the rights of any person who reports wrongdoing in good faith. AOP will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a report of wrongdoing, or against that person's colleagues, or relatives. For example: the person must not be disadvantaged or victimised by having made a report by:

- Dismissal
- Demotion
- Any form of harassment
- Discrimination
- Current or future basis
- Threats of any of the above

Other actions that may result in disciplinary action, which may lead to dismissal include: maliciously and falsely reporting misconduct, not cooperating with an investigation, unauthorised disclosure of information relating to a report, and revealing the identity of an AOP employee, partner or contractor who has made a report of wrongdoing or information from which the identity of the reporting person could be inferred.

If a person who has made a report believes retaliatory action or victimisation has occurred or been threatened, the person who made the report has the right to make a submission to the AOP Board.

The Board is independent of management and will arbitrate the matter.

Monitoring and review of policy and procedure:

AOP's Whistleblowing Program under this policy must be reviewed every 2 years by the AOP Board and/or relevant committees.

The review must address the efficiency of the Whistleblowing Policy and in particular with the constraints of confidentiality and any other legal restrictions. It must consider the fairness of the investigations undertaken, the actual consequences of making disclosures for people who have made reports and compliance with this policy generally.

AOP Whistleblowing Policy APPROVED: 2010 & 2014

LAST REVISION: January 2018

NEXT REVISION: February 2021