

WHISTLEBLOWER PROTECTION POLICY

1 Policy Intent

This policy outlines how Lifeline WA facilitates and manages instances of whistleblowing in the organisation to ensure staff are aware of their obligations to report and feel confident and protected when making appropriate disclosures.

Lifeline WA is committed to promoting and upholding a culture with a high level of integrity and ethical behaviour in all business operations and as such requires all Lifeline WA people to disclose reportable conduct, wherever it is discovered in the business.

This policy will ensure that:

- All instances of reportable conduct are appropriately disclosed and investigated.
- All Lifeline WA people feel confident when making disclosures and don't fear negative outcomes.
- Lifeline WA people understand the procedures around whistleblowing, why they are important, their legal rights relating to whistleblowing and know where to go for more information.

2 Scope

This policy applies to all Lifeline WA people.

This policy does not apply to personal work-related grievances such as:

- Interpersonal conflict between staff members.
- Decisions that do not involve a breach of workplace laws.
- Decisions about the employment conditions of a staff member.
- Decisions relating to performance management or disciplining a staff member.

To address issues such as these, the Grievance Resolution Policy applies.

3 Definitions

Appropriate Disclosure	<p>Any disclosure made by a person who:</p> <ul style="list-style-type: none"> • Believes that the information they have is, or may be, true • Acts in good faith, with no gain for themselves or a third party • Has or knows of evidence to support their reasonable suspicions
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Corrupt Behaviour	Dishonest activity in which a person acts contrary to the interests of Lifeline WA by abusing their position in order to achieve some personal gain or gain for a third party
Fraudulent Behaviour	Dishonest activity involving: <ul style="list-style-type: none"> • Actual or potential financial loss • Deliberate falsification or concealment of data • Destruction or use of falsified documents
Illegal Activity	Dishonest activity including but not limited to: <ul style="list-style-type: none"> • Theft • Drug sale or use • Violence or threatened violence • Criminal damage against property • Breaches of Commonwealth or state legislation
Lifeline WA People	Within the context of this policy this term includes: <ul style="list-style-type: none"> • Employed and volunteer staff • Board members • Temporary or casual staff • Contractors
Negative Outcome	Any action against a person that constitutes, causes or involves: <ul style="list-style-type: none"> • An injury, damage, or loss • Intimidation, harassment or fear of either • Dismissal, demotion or disadvantage • Discrimination or bias that could impact a person's career • Reprisal or repercussions
Reportable Conduct	Suspected behaviours or actions that could be described as: <ul style="list-style-type: none"> • Fraudulent • Corrupt • Illegal • Unethical • Unsafe

Person Under Investigation (PUI)	A Lifeline WA person under investigation because of a disclosure
Unethical Behaviour	Any harmful action that violates the moral norms of the broader community.
Vexatious Complaint	Any complaint made for personal gain or intended to hurt or disrupt another person's life or career
Whistleblower	Any person who exposes any kind of information or activity that is deemed corrupt, illegal, unethical, unsafe or fraudulent within an organisation. This includes, but is not limited to, current and former employees, contractors and associates as well as their spouses, dependents and other relatives.
Whistleblower Investigations Officer (WIO)	A suitably nominated person who has the responsibility of conducting investigations into reports received from a whistleblower

4 Relevant Legislation and Regulations

This policy complies in principle with the:

- CORPORATIONS ACT 2001 (Sec 1317AA, AC, AE)
- TAXATION ADMINISTRATION ACT 1953 Cth

5 Policy Details

5.1 Reporting

Disclosures should be made to the CEO at whistleblower@lifelinewa.org.au. If this is not possible or the disclosure relates to, or may relate to, the conduct of the CEO, a report may be made directly to the Chair of the Lifeline WA Board at chair@lifelinewa.org.au.

In the event that the individual does not feel comfortable reporting to either of these parties, they may lodge an anonymous report to the Chair by filling out the Whistleblower Report Form; accessed here: https://form.jotform.com/LWA_Governance/whistleblower-report (Appendix 8.a). The appropriate reporting process has been summarised in Appendix 8.b.

All reports must be made in good faith and not constitute vexatious complaints. Disclosures can be made anonymously where a statement is not required as evidence, however, sufficient evidence is required to validate and act on reports.

5.2 Investigations

All disclosures of reportable conduct are to be subject to a thorough and unbiased investigation. Investigations are conducted with the objective of locating evidence that either substantiates or refutes the report.

Where appropriate, external investigators or the police may be employed, particularly where the allegation is serious or if the disclosure relates to a criminal offence.

5.3 Outcomes & Disciplinary Procedures

Whistleblowers, unless they have submitted an anonymous disclosure, will receive a clear determination on conclusion of the investigation; Lifeline WA reserves the right to dismiss any allegations it deems non-reportable or unsubstantiated.

Any Lifeline WA person who makes a false report, vexatious complaint or engages in serious or illegal misconduct is subject to disciplinary proceedings as laid out in the Code of Conduct. A breach of this policy is regarded as a serious disciplinary matter and will be dealt with accordingly.

5.4 Confidentiality and Protections

All parties in the whistleblowing process have the right to confidentiality and protections; as such any associated communication, files or audit trails are to be kept secure and separate from other data.

Lifeline WA people are strictly prohibited from discriminating against, harassing or victimising any suspected or actual whistleblower or individual being investigated, their colleagues, friends or relatives.

Whistleblowers have the right to request positive action from Lifeline WA to protect them where it isn't possible to maintain their anonymity (e.g. leave of absence during the investigation).

All disclosures will be kept strictly confidential and secure as long as the disclosure does not constitute a breach of law. Investigation Officers are prohibited from revealing any details of a disclosure without the whistleblower's express, written consent.

Lifeline WA will apply the principles of procedural fairness ensuring that we act fairly for all parties involved in the reporting process.

5.5 Informing the Board

The Lifeline WA Board will be informed of all reports. All disclosures made to the CEO will be reported to the Board at the next scheduled Board meeting. All disclosures made to the Chair, direct or anonymous, will also be reported to the Board at the next scheduled meeting. If the disclosure relates to, or may relate to, the conduct of the CEO, the Chair may choose to discuss this with the Board in camera.

6 Responsibilities

6.1 Lifeline WA People

All Lifeline WA people are expected to observe the highest standards of ethics and integrity; they are required to conduct themselves in a professional and courteous manner at all times, including during disclosures and investigations.

Lifeline WA people must promptly disclose any conduct or action they suspect could be considered reportable as defined by this policy or any conduct which may cause financial or non-financial loss to Lifeline WA or be otherwise detrimental to the interests of the organisation.

If the identity of a whistleblower, a staff member under investigation, or any details regarding a disclosure is revealed to any Lifeline WA person, that individual is obligated not to reveal any details to any party, even after their engagement with Lifeline WA has come to an end, unless they have been specifically authorised to do so.

6.2 Whistleblower

Whistleblowers must make disclosures in good faith and not for their or a third party's benefit.

They must ensure they have attempted to resolve any issues using an appropriate reporting structure and not reveal any details regarding a disclosure to an unauthorised party, even after their engagement with Lifeline WA has come to an end.

6.3 Whistleblower Investigations Officer

An individual who investigates the substance of a disclosure to determine whether there is evidence in support of the matters raised or, alternatively, to refute the report made.

To carry out these tasks effectively, nominated officers should have:

- Sound judgement
- Strong investigation skills
- Empathy, integrity, wisdom and restraint
- A non-discriminatory manner with proper regard for people's rights and dignity
- Diplomacy and proven communication skills
- Objectivity and consistency with investigations and making recommendations
- The ability to refrain from making assumptions and avoid bias in decision making
- Commitment to maintaining confidentiality for all sensitive and private information, even after their engagement with Lifeline WA has come to an end.
- Conflicts of interest (real, potential or perceived) noted.

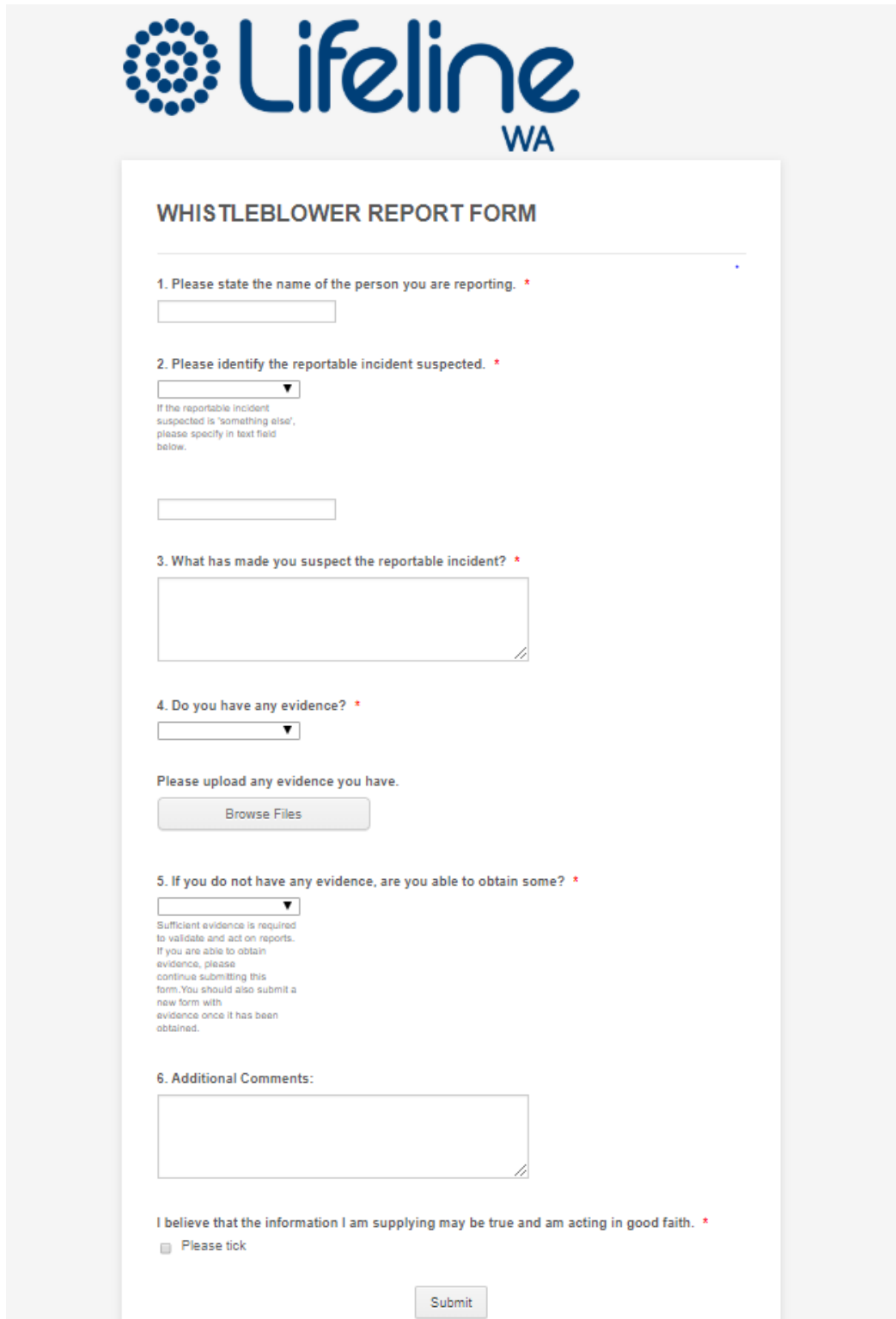
7 Procedure

Disclosure/report is made directly to the CEO at whistleblower@lifelinewa.org.au or Chair at chair@lifelinewa.org.au , or anonymously via Whistleblower Report Form.	Staff member
CEO or Chair appoints a Whistleblower Investigation Officer (WIO).	CEO or Chair
CEO or Chair informs the Lifeline WA Board.	CEO or Chair
WIO develops an Investigation Plan which outlines the approach and timeline for investigating the report.	WIO
CEO or Chair reviews approach and timeline. Approve the Investigation Plan.	CEO or Chair
Present Investigation Report to CEO or Chair	WIO
CEO or Chair receives report and decides on appropriate corrective action that should be taken.	LWA Board
CEO or Chair informs the Board.	CEO or Chair
CEO or Chair follows up with the whistleblower, unless disclosure is anonymous, to inform that report has been investigated and to ensure the whistleblower is not experiencing signs of retaliation.	CEO or Chair

8 Appendices & References

The following documents relate to this policy:

a. Whistleblower Report Form (screenshot)



The screenshot shows the 'WHISTLEBLOWER REPORT FORM' from Lifeline WA. The form is titled 'WHISTLEBLOWER REPORT FORM' and contains the following sections:

- 1. Please state the name of the person you are reporting. ***
- 2. Please identify the reportable incident suspected. ***

If the reportable incident suspected is 'something else', please specify in text field below.
- 3. What has made you suspect the reportable incident? ***
- 4. Do you have any evidence? ***

Please upload any evidence you have.
- 5. If you do not have any evidence, are you able to obtain some? ***

Sufficient evidence is required to validate and act on reports. If you are able to obtain evidence, please continue submitting this form. You should also submit a new form with evidence once it has been obtained.
- 6. Additional Comments:**
- I believe that the information I am supplying may be true and am acting in good faith. ***
 Please tick
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b. Whistleblower Reporting Process

