

Policy Number: **OS07**

Policy Area: **Organisational Integrity and Standards**

Policy Title: **Whistle Blower Policy**



Related Document: OS02 Complaints Policy
OS02.1 Complaints Handling Process
G19 Retention and Use of Records

Policy statement

GMP is committed to operating in Australia and overseas in accordance with the relevant legal statutes and high ethical standards. A whistle-blower complaint is one thought to be in the organisation's interest or the public interest.

This policy:

- provides a channel for employees, implementing partners, associate partners and related stakeholders to raise serious and sensitive concerns;
- ensures that such concerns are treated seriously and appropriately, and
- ensures that any person raising a serious concern in good faith will be protected from reprisals or retaliation.

Employees and volunteers (either GMP or those of an implementing partner) who have a concern are encouraged to initially discuss such matters, in confidence, with a senior staff member or the chair of the GMP Board.

This policy **means that serious and sensitive concerns that** could be in the public-interest and/or have an adverse impact on the well-being, reputation or operations of GMP, its partners and projects, and which due to the nature of the concern cannot be reported through normal reporting lines can be investigated.

These concerns include, but are not limited to, the following:

- unlawful activity;
- breaches of the ACFID Code of Conduct;
- financial fraud (for example accounting manipulation, non-compliance with internal controls/procedures, misappropriation of assets or fraudulent expenditure or statements);
- bribery or corruption (for example conflicts of interest, bribery, sponsorships & donations, gifts or facilitation payments);
- serious endangerment to the environment, health and safety;
- activities which otherwise by law, treaty or agreement, amount to serious improper conduct (for example discriminatory practises, use of child labour, bullying, human rights violations).

Confidentiality

- GMP will treat all concerns and issues raised under this policy in a confidential manner, except to the extent it is necessary to conduct a complete and fair investigation.
- All whistle-blower communication will be anonymous and confidential unless the individual raising the concern directly instructs otherwise.
- Persons raising complaints under this policy are encouraged to identify themselves and explain their concern with as much information as possible and sufficient detail to assist GMP in investigating the matter. The identity of the complainant shall be kept confidential.
- However, follow-up questions and the investigation may not be possible unless the source of the information is identified.

No discrimination or retaliation

- GMP will ensure that there will be no discriminatory or retaliatory action against any employee, volunteer or third party who reports a concern to GMP in good faith based on his/her personal knowledge.
- If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he/she should immediately report such perceived retaliation to the Executive Officer or to the Chair of the GMP Board.
- All such reports will also be investigated confidentially.
- Allegations of a vexatious nature and without any factual substance may result in disciplinary action if the complainant is an employee.

Receipt and retention of concerns and investigation

- Each complaint or concern should be directed to the Executive Officer of GMP or the Chair of the GMP Board.

Investigation

- Some complaints or concerns may be resolved without requiring extensive investigation.
- The GMP Complaint Handling Policy G10.1 will be followed when investigating a whistle-blower complaint. The person raising the complaint shall receive a report within 30 business days of the initial reported concern, and be informed as to the investigation process.
- The Executive Officer may, at his/her sole discretion, consult with the Board of GMP as well as any senior members of management and may also engage external consultants to assist in the investigation.

Remedial Action

- The outcome of the investigation shall be submitted to the Board of GMP. The Board, depending on the gravity and magnitude of the violation, will enact any disciplinary actions or corrective measures as a result of the investigation. If an investigation shows any violation of this policy, appropriate remedial action will be taken.
- The conclusion of the investigation and any remedial action taken will be reported to the complainant.

Retention of the Records

- According to *G19 Retention and Use of Records* GMP shall retain a copy of all complaints or concerns, investigation reports and all relevant documentation.
- The Board shall decide the period of retention of all these records by GMP, subject to limitations in any applicable legislation.