

Policy Number: **OS07**
Policy Area: **Organisational Integrity and Standards**
Policy Title: **OS07 Whistle Blower Policy**



1. Overview

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 and/or the public interest.

2. Purpose

GMP's Whistle Blower Policy is intended to ensure that information about illegal or unethical issues are brought to light early, so that they can be detected, addressed and, ideally, prevented. Cultivating an environment where whistleblowers feel safe to come forward is critical to achieving this and assisting the board to effectively discharge its oversight of financial and nonfinancial risks.

3. Scope

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.

4. Responsibility

It is the responsibility of the CEO, Board Chair and/or Deputy Board Chair to manage this policy.

5. Background

Whistleblowing is essentially bringing light or exposing a behaviour that is unacceptable.

In John 2 and Luke 19 we read accounts of Jesus turning the tables of money changers in the temple courts when he found people making money there, declaring *"My house will be a house of prayer"; but you have made it 'a den of robbers.'* Jesus addresses the unacceptable behaviour and is considered by some theologians to be a whistleblower.

Proverbs 9:5-8 (Message) adds *"You blow the whistle on godless nations; you throw dirty players out of the game, wipe their names right off the roster. Enemies disappear from the sidelines, their reputation trashed, their names erased from the halls of fame. God holds the high center, he sees and sets the world's mess right. He decides what is right for us earthlings, gives people their just deserts."*

Whistleblowing is not entirely a biblical standard. Whistleblowers have protections under Australian law. ASIC's Whistleblowing website reads:

Whistleblowers play an important role in identifying and calling out misconduct and harm to consumers and the community. To encourage whistleblowers to come forward with their concerns and protect them when they do, the Corporations Act 2001 (Corporations Act) gives certain people legal rights and protections as whistleblowers.

From 1 July 2019, the whistleblower protections in the Corporations Act have been expanded to provide greater protections for whistleblowers.

6. Policy Statements

- a. 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.
- b. 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.
- c. 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).

7. Reporting of Concerns

- a. Whistle-blower concerns may be reported to:
 - i. the Executive Officer and/or;
 - ii. to the Board Chair and/or;
 - iii. to the Deputy Board Chair.

8. Confidentiality

- a. 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.
- b. All whistle-blower communication will be anonymous and confidential unless the individual raising the concern directly instructs otherwise.
- c. 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.

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- d. However, follow-up questions and the investigation may not be possible unless the source of the information is identified.

9. No discrimination or retaliation

- a. 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.
- b. 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.
- c. All such reports will also be investigated confidentially.
- d. Allegations of a vexatious nature and without any factual substance may result in disciplinary action if the complainant is an employee.

10. Investigation

- a. Some complaints or concerns may be resolved without requiring extensive investigation.
- b. *OS02.1 GMP Complaint Handling Process* 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.
- c. 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.

11. Remedial Action

- a. 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.
- b. The conclusion of the investigation and any remedial action taken will be reported to the complainant.

12. Retention of the Records

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

13. Procedures and related forms

- a. *OS02.1 GMP Complaint Handling Process*

14. References (other policies, legislation or codes)

a. Related Policies

- i. G19 Retention and Use of Records

b. Related Documents

- i. [ACNC Whistleblower Protections](#)
- ii. [ASIC Whistleblowing](#)
- iii. [AICD Whistleblowing Director Duties and Responsibilities](#)
- iv. [ACFID Code of Conduct - Principle 9 People and Culture \(9.2.2 specifically\)](#)

TABLE 1. VERSION CONTROL TABLE

OS07 Whistle-Blower Policy			
Version Number	Purpose/change	Author	Date
1	Adopted	Board	MAY2015
2	Amended	Board	MAY2021
3	New format with Version Control Table Updated email addresses and removal of repetition of reporting addresses	Board	JUN2023
4	Adopted new format, replaced names with roles	CEO	Nov 2024