



RAWCS Whistleblowing Policy and Procedure

JUNE 2024

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1. Introduction

1.1 Who we are

- 1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We back doing good by supporting and facilitating a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers three Tax Deductible funds:
1. **Rotary Australia Overseas Aid Fund (RAOAF):** This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
 2. **Rotary Australia Benevolent Society (RABS):** RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
 3. **Rotary Australia Relief Fund (RARF):** This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.

1.2 Purpose

- 1.2.1 RAWCS is committed to conducting its activities professionally, honestly and with integrity. We do not tolerate unethical, unlawful or undesirable conduct. Transparent whistleblower policies are essential to good risk management and corporate governance. They help uncover misconduct that may not otherwise be detected. Often, such wrongdoing only comes to light because of individuals (acting alone or together) who are prepared to disclose it, sometimes at great personal and financial risk.
- 1.2.2 Whistleblower protection laws under the *Corporations Act 2001* (Cth) (Corporations Act):
- encourage whistleblowers to come forward with their concerns about misconduct or breaches of the law and protect them when they make a disclosure;
 - promote good risk management and corporate governance; and
 - promote ethical behaviour by organisations and encourage them to deal with disclosures of misconduct seriously.
- 1.2.3 This policy and procedure documents our commitment to maintaining an environment in which our people, 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 RAWCS and/or its partners.

- 1.2.4 This policy and procedure complements our Complaints Handling Policy and Procedure and provides an alternative means of reporting alleged or suspected wrongdoing where the usual channels appear to have failed or may be inappropriate.
- 1.2.5 The purpose of this policy is to:
- encourage the reporting of matters that may cause harm to individuals or financial or nonfinancial loss to RAWCS or damage to its reputation;
 - enable RAWCS to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided;
 - establish policies for protecting whistleblowers against reprisal by any person internal or external to the entity;
 - provide for the appropriate infrastructure;
 - help to ensure RAWCS maintains the highest standards of ethical behaviour and integrity.

1.3 Scope and Governance

- 1.3.1 This policy applies to RAWCS and all of its administered funds and subsidiaries – referred inclusively within this policy as RAWCS.
- 1.3.2 This policy applies to any person who is, or has been, any of the following with respect to RAWCS (within this policy all of these are represented by the term: “**our people**”).
- Employee
 - Volunteer
 - Director
 - Contractor (including sub-contractors and employees of contractors)
 - Supplier (including employees of suppliers)
 - Consultant
 - Auditor
 - Relative, dependant, spouse or dependant of a spouse of any of the above
- 1.3.3 It also extends to all our partners, program participants or any other individual that reports misconduct or makes any complaints in relation to our people, our programs and our organisation.

1.4 Whistleblower protection laws

- 1.4.1 The *Corporations Act 2001* (Cth) (Corporations Act) and the *Taxation Administration Act 1953* (Cth) both contain protections for whistleblowers.
- 1.4.2 Serious penalties can apply to people who breach a whistleblower’s confidence or retaliate against whistleblowers.
- 1.4.3 RAWCS is committed to ensuring these legislative protections are complied with, and our policy is designed to ensure those legislative protections are provided to whistleblowers who make reports.

1.3 Policy References

1.3.1 This policy was developed with references to the following documents:

- ACFID Code of Conduct
- RAWCS Code of Conduct
- RAWCS Commitment to Human Rights, Humanitarian Principles and Racial Justice Statement
- RAWCS Equity, Diversity & Inclusion Policy
- RAWCS Child Safeguarding Policy and Code of Conduct
- RAWCS Prevention of Sexual Exploitation, Abuse and Harassment Policy
- RAWCS Gender Equity Policy
- RAWCS Disability Inclusion Policy
- RAWCS Fraud, Corruption and Counter-Terrorism Policy
- RAWCS Occupational Health & Safety Policy
- RAWCS Conflict of Interest Policy
- RAWCS Communication and Transparency Policy
- RAWCS Privacy Policy
- RAWCS Non-Development Activity Policy
- RAWCS Complaint Handling Policy and Procedure

1.4 Definitions

Term	Definition
Whistleblowing	Whistleblowing is when a person connected to a company or organisation reports potential misconduct or breaches of the law by that company or organisation to an authorised person or government regulator.
Eligible Whistleblower	<p>Legal protections are available to ‘eligible whistleblowers’. An eligible whistleblower can be:</p> <ul style="list-style-type: none"> • a current or former employee of the company or organisation, or a related company or organisation; • a current or former officer (ie. director or company secretary) of the company or organisation, or a related company or organisation; • a contractor, consultant or service provider (current or former) who has supplied goods and services to the company or organisation, or a related company or organisation; • a volunteer (current or former) who has supplied goods and services to the company or organisation, or a related company or organisation; or • a spouse, relative or dependant of any of the people listed above
Whistleblower protections	The protections provided to whistleblowers to enable them to come forward to report misconduct without fear of retribution or personal detriment.
Whistleblower Protection Officer	Whistleblower Protection Officers (WPO) will be appointed to oversee adherence and application of this policy and procedure and to be the referral point for all investigations and subsequent board reporting. This person must be of a level of seniority commensurate with the responsibilities of this role. Where possible, 2 WPOs will be nominated, one male, one female in order to provide a gender option for Whistleblowers.

Reportable Conduct	Includes, but is not limited to: <ul style="list-style-type: none"> • breach of legal obligations (including negligence, breach of contract, breach of administrative law); • criminal offences; • breach of human rights; • actual or suspected fraud; • abuse of authority; • disclosures related to miscarriages of justice; • health and safety risks, including risks to the public as well as our people; • damage to the environment; • the unauthorised use or mismanagement of organisational funds; • possible fraud and corruption; • a breach of any internal Policy including (but not limited to) the Code of Conduct, Prevention of Sexual Exploitation, Abuse & Harassment Policy or Child Safeguarding Policy and Code of Conduct; • other unethical conduct; or • the concealment of any of the above.
Protected Disclosure	A report made about improper conduct or wrongdoing that is protected under this policy.

1.5 What is Not Reportable Conduct

- 1.5.1 This Policy is not intended to apply to disclosures relating to conduct concerning a person's individual employment or engagement (other than as set out in Reportable Conduct) such as:
- personal, work-related grievances such as those relating to harassment, discrimination or disciplinary matters;
 - alleged workplace discrimination or bullying;
 - personal disputes between staff or volunteers; or
 - decisions regarding the engagement, transfer or promotion of staff or volunteers.

2. Principles

2.1 Guiding Principles

- 2.1.1 **Integrity:** We uphold the highest standards of legal, ethical, and moral conduct. Our operations and behaviours must consistently reflect our values, purpose, Code of Conduct, and other organisational policies.
- 2.1.2 **Protection from retaliation:** We ensure that individuals disclosing actual or suspected wrongdoing can do so without facing personal disadvantages. It is crucial that our whistleblowers are protected from any form of retaliation or reprisal, enabling them to report misconduct safely and confidently.
- 2.1.3 **Good faith reporting:** We are obligated to act in good faith and have reasonable grounds for believing that the information disclosed indicates reportable wrongdoing.
- 2.1.4 **Supportive reporting environment:** We are committed to cultivating an environment where valid concerns about reportable conduct can be raised without fear. It is our right and duty to report suspected misconduct openly and honestly.

- 2.1.5 **Confidential and respectful handling:** We respond to all disclosures of reportable conduct in a timely, respectful, and confidential manner, ensuring the protection of the whistleblower's identity and rights.
- 2.1.6 **Whistleblower support and protection:** We provide the necessary support and protection to whistleblowers who report misconduct in good faith. This includes safeguarding them from any detrimental consequences resulting from their report.

3. Policy Commitments

3.1 *Protection of Whistleblowers*

- 3.1.1 We are committed to ensuring that any person who makes a protected disclosure is treated fairly and does not consequentially suffer detriment and that confidentiality is preserved in respect of all matters relating to protected disclosures.
- 3.1.2 To meet our obligations and procedures for protected disclosures, the organisation adopts the principle of providing protection to people or organisations with a relationship with RAWCS:
- at least to the extent of protection provided at law; and
 - beyond that legal protection, wherever it is practical in the circumstances.
- 3.1.3 A report may not protect the whistleblower from the consequences flowing from involvement in the wrongdoing itself.

3.2 *Confidentiality of whistleblower's identity and whistleblowing report*

- 3.2.1 If a person or organisation makes a disclosure, we will not disclose (and no other person may disclose) any information that would suggest or be likely to reveal that person's or organisation's identity.
- 3.2.2 The exception to the above protection is if RAWCS discloses the whistleblower's identity:
- with the person's or organisation's consent;
 - to ASIC, APRA or the Australian Federal Police or other person or body prescribed by regulations;
 - to the extent required or authorised by law; or
 - to a legal practitioner for the purposes of obtaining legal advice or legal representation.
- 3.2.3 When a disclosure is investigated it may be necessary to reveal its substance to people without the whistleblower's consent in order to investigate and deal with the matter, such as RAWCS management, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. At some point in time, it may also be necessary to disclose the fact and the substance of a report to a person(s) who may be the subject of the report. In such cases, we may do so provided that:
- the information so disclosed does not include the discloser's identity (unless consented to by the whistleblower); and
 - we have taken all reasonable steps to reduce the risk that the discloser will be identified from the information. Even after taking such steps, in some circumstances the source of the reported issue may be obvious to a person who is the subject of a report.

- 3.2.4 To protect the confidentiality of records, we will also take all reasonable measures to store any records relating to a report of a protected disclosure securely and to permit access by authorised persons only. This includes the following measures:
- all paper and electronic documents and other materials relating to disclosures will be stored securely;
 - all information relating to a disclosure can only be accessed by those directly involved in managing and investigating the disclosure;
 - only those people who are directly involved in handling and investigating a disclosure are made aware of a discloser's identity or information that is likely to lead to the identification of the discloser;
 - communications and documents relating to the investigation of a disclosure are not sent to an email address or to a printer that can be accessed by other staff without appropriate security features; and
 - each person who is involved in handling and investigating a disclosure is reminded that they should keep the identity of the discloser and the disclosure confidential and that an unauthorised disclosure of a discloser's identity may be a criminal offence.
- 3.2.5 Information and awareness of Whistleblower processes will be provided to support the application of confidentiality of the content and identity of the person(s) named in disclosures.
- 3.2.6 Unauthorised disclosure of information relating to a report, the identity of a person or organisation that has made a report of wrongdoing the subject of a protected disclosure, or information from which the identity of the reporting person or organisation could be inferred will be regarded seriously and will be dealt with accordingly by the CEO.

3.3 Protection from legal action

- 3.3.1 A discloser will not be subject to any civil, criminal, or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.
- 3.3.2 Any information provided will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

3.4 Protection from detrimental conduct

- 3.4.1 Committing to the protection and respect of the rights of a person or organisation that makes a protected disclosure, we do not tolerate any detriment, retaliatory action, omission or threats of retaliatory action as a reaction to a protected disclosure, including against a person's colleagues, employer (if a contractor or supplier) or relatives, even if the protected disclosure is merely part of the reason for the action, omission or threats.
- 3.4.2 Detrimental conduct includes actual or threatened conduct such as the following (without limitation):
- dismissal of an employee;
 - injury of an employee in his or her employment;
 - alteration of an employee's position or duties to his or her disadvantage;
 - discrimination, harassment or intimidation;
 - physical or psychological harm;
 - damage to a person's property;

- damage to a person's reputation;
- damage to a person's business or financial position; and
- any other damage to a person.

- 3.4.3 We also strictly prohibit all forms of detrimental conduct against any person who is involved in an investigation of a matter disclosed under the policy in response to their involvement in that investigation.
- 3.4.4 We will take all reasonable steps to protect a whistleblower from detrimental conduct and will take necessary action where such conduct is identified. If appropriate, we may allow a whistleblower to perform their duties from another location or make other modifications to the whistleblower's workplace or duties to protect them from the risk of detriment.

4. Whistleblower Procedure

4.1 *Making a disclosure*

- 4.1.1 We rely on our people to maintain a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.
- 4.1.2 The first step is to determine if the matter you are reporting is Reportable Conduct. (*See the Definition Section for criteria*). Examples of the types of conduct that could constitute Reportable Conduct are:
- fraud, corruption or theft;
 - money laundering or misappropriation of funds;
 - offering or accepting a bribe; and
 - engaging in or threatening detrimental conduct against a person who has made a whistleblower disclosure or is believed to have made, or is planning to make, a disclosure.
- 4.1.3 Is it a personal work-related grievance relating to your current or former employment? Some examples of personal work-related grievances are:
- an interpersonal conflict between the discloser or another person;
 - a decision about the engagement, terms and conditions of employment, transfer or promotion of the discloser;
 - a decision to suspend or terminate the engagement of the discloser, or otherwise discipline the discloser;
 - a decision that does not involve a breach of workplace laws.
- 4.1.4 If it is a personal work-related grievance, it is not covered under the Act and the Whistleblower Policy and should be discussed with your manager/supervisor.
- 4.1.5 We encourage eligible whistleblowers to make their disclosure to the Whistleblower Protection Officer. A report can be made orally or in writing. (delivered, mailed or emailed) to the Whistleblower Protection Officer – complaints@rawcs.org.au

4.1.6 Suggested information to include in your report is:

- The person(s) suspected of any Improper Conduct or involvement in Improper Conduct.
- The nature of the suspected Improper Conduct (e.g. fraud, negligence or other Improper Conduct).
- Any evidence of the suspected Improper Conduct (regardless of format) and the location of any other evidence.
- The dates of the suspected Improper Conduct.
- Details of any witnesses.
- Any concerns of reprisals to you by making this report.
- Any other details you consider relevant.

4.1.7 You can remain anonymous in making your report, over the course of the investigation and after the investigation is finalised. This must be considered when you make that report. (If you wish to remain anonymous a pseudonym name and contact details maybe used).

4.2 Investigation

4.2.1 Upon receipt of a disclosure, the Whistleblower Protection Officer will assess the disclosure to determine:

- whether the disclosure falls within the definition of a Protected Disclosure; and
- if so, whether a formal investigation is required.

4.2.2 As part of the initial assessment, the Whistleblower Protection Officer will assess the risk of detriment to the Whistleblower or any other person in relation to the disclosure. The discloser may be contacted to get follow up information.

4.2.3 The Whistleblower Protection Officer will ensure appropriate measures are in place to protect the Whistleblower during the investigation process, which consider the level of assessed risk.

4.2.4 There are some circumstances in which a whistleblower disclosure may have to be reported to ASIC or the Australian Federal Police or to a legal practitioner for the purpose of obtaining legal advice regarding the whistleblower disclosure. In these circumstances, the Whistleblower Protection Officer will advise the whistleblower of such obligations.

4.2.5 If further investigation is appropriate, the Whistleblower Protection Officer will:

- confirm their independence;
- determine the nature and scope of the investigation;
- consider whether any technical, financial or legal advice may be required to support the investigation; and
- assess the appropriate timeframe to conduct the investigation.

4.2.6 The investigation will be conducted independently of the person/s to which the allegations relate. However, if it is appropriate, the subject of the allegations may be contacted to respond to the allegations.

4.2.7 If necessary, the whistleblower may be contacted to obtain further information regarding the disclosure. A whistleblower may refuse to answer questions if it is felt this could reveal their identity. Due to the nature of the types of disclosure covered by the whistleblower provisions of the Corporations Act, the matter may be referred to an external body for investigation (e.g. an auditor to conduct a forensic analysis of financial records).

- 4.2.8 The Whistleblower Protection Officer must seek approval from the whistleblower to provide any external investigator with their name and contact details. This external investigator will only contact the whistleblower if they have provided consent.
- 4.2.9 It is the Whistleblower Protections Officer's responsibility to ensure that the investigation is conducted in a timely manner. The investigator will conduct the investigation as soon as practicable and will ensure it is fair and independent from any persons to whom the disclosure relates.
- 4.2.10 The investigator will ensure that every individual subject to the investigation is granted sufficient opportunity to reply to allegations before any findings are made.
- 4.2.11 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.
- 4.2.12 The investigator has direct, unfettered access to independent financial, legal and operational advisers as required (within the means of RAWCS), and a direct line of reporting to the CEO or Chair of the Board, as may be required to satisfy the objectives of this policy.
- 4.2.13 An investigator appointed to investigate a protected disclosure will act impartially and without bias in conducting the investigation. An investigator must declare any material personal interest the investigator has in any matter relevant to the investigation for which the investigator has responsibility. The investigator must then take no further part in the investigation unless directed otherwise (other than to provide relevant material or information by way of a handover to a new investigator or to take any necessary incidental action for that purpose).
- 4.2.14 An investigation into a *protected disclosure* will follow a fair process including:
- informing a person of the substance of a protected disclosure, as far as it applies to that person;
 - giving the person a reasonable opportunity to respond to any matter referred to above, before the investigation is finalised;
 - informing the person of any adverse finding directly affecting them arising out of the investigation; and
 - giving the person a reasonable opportunity to respond to any such adverse finding before the report is finalised.
- 4.2.15 As a general guide and subject to the particular circumstances applying to the disclosure, the steps in the investigation process will normally include the following:
- interview the whistleblower to obtain relevant information;
 - interview any alleged wrongdoer to obtain a response to the disclosure in so far as it relates to the alleged wrongdoer;
 - interview any relevant witnesses regarding relevant matters arising from the disclosure;
 - review any documents or other material relevant to the disclosure;
 - if necessary, conduct further interview/s with the whistleblower to obtain further information or a response to material arising from the investigation; and
 - if necessary, conduct further interview/s with any alleged wrongdoer regarding further material arising from the investigation.

4.2.16 Interviews can be conducted in person, online or via telephone depending on the circumstances. All relevant material including interviews and documents obtained during the investigation is then considered and a report prepared.

4.2.17 The investigator must keep the CEO and/or Chair regularly informed of the investigation progress

4.3 Report on outcomes

4.3.1 Once the investigation has been completed, the Whistleblower Protection Officer will ensure a report is provided that includes a summary of the allegations and the evidence. The final determination, being that any allegation was:

- substantiated;
- partially substantiated;
- unable to be substantiated; or
- disproven.

4.3.2 The report will make findings of fact and determine whether a disclosure has been substantiated or not substantiated, in whole or part. The report may also include recommendations arising from any factual findings.

4.4 Breach of Confidentiality

4.4.1 If a breach of confidentiality occurs, the whistleblower can lodge a complaint to the Whistleblower Protection Officer. The complaint will be investigated as a separate matter, protections will be put in place to protect disclosures during the investigation

4.5 Protecting the Whistleblower

4.5.1 The person receiving a report from a whistleblower, Whistleblower Protection Officer and any investigator shall ensure that the matter and the identity of the whistleblower (or information that may lead to the identity of the whistleblower) if provided, is protected.

4.5.2 All files relating to a report are to be kept secure, and the information received held in confidence and only disclosed to a person not connected with the investigation if:

- the whistleblower has been consulted and has consented to the disclosure; or
- it is required or permissible by law (this includes to ASIC, the Australian Federal Police or a legal practitioner for the purpose of obtaining legal advice regarding the whistleblower disclosure).

4.6 Communication with the Whistleblower

4.6.1 All communications with a whistleblower should be undertaken by the Whistleblower Protection Officer to ensure that the whistleblower remains anonymous and to safeguard the independence and integrity of an investigation.

4.6.2 The Whistleblower Protection Officer will contact the whistleblower to acknowledge receipt of the disclosure and to establish a process, including expected timeframes, for reporting to the whistleblower on the progress of dealing with the disclosure.

- 4.6.3 All relevant information regarding an investigation will be provided to the Whistleblower Protection Officer investigator so that the Whistleblower Protection Officer can keep the Whistleblower apprised of the progress.
- 4.6.4 Where it is determined that there is insufficient information to warrant a formal investigation, the Whistleblower Protection Officer will inform the whistleblower as soon as practicable.
- 4.6.5 Upon determination of the final outcome of an investigation, the whistleblower will be contacted by the Whistleblower Protection Officer and provided with appropriate details regarding the outcome.

4.7 Record Keeping

- 4.7.1 We will ensure the whistleblowing process is adequately evidenced by appropriate records and those records are securely maintained. At a minimum, the following types of records shall be maintained:
- the Whistleblower Disclosure;
 - the investigation report and related evidence, communications and records;
 - communications with the whistleblower and any other stakeholders involved in the process; and
 - internal/external reporting on the whistleblower matter.
- 4.7.2 Due to the sensitive nature of whistleblower matters, the records above must be kept with restricted access.

4.8 Corrective Action and Compliance

- 4.8.1 If we find the allegations to be unsubstantiated, we will make every effort to address any negative effects on the reputation and morale of the person/s involved.
- 4.8.2 Any potential disciplinary action against a person arising out of or as a result of an adverse finding in an investigation report under this policy will be dealt with consistently with our usual practice, policy or procedure relating to a disciplinary action.
- 4.8.3 As part of the investigation into reports made under this policy, recommendations for change will be invited from the person making the report and/or the CEO to enable RAWCS to minimise the risk of the recurrence of any reportable conduct that has been disclosed. The CEO, or a designated senior manager, will be responsible for reviewing and implementing these recommendations.

4.9 Remedies

- 4.9.1 A whistleblower or any other person can seek remedies including compensation, civil penalties, or other remedies through the courts if:
- they suffer loss, damage, or injury because of a disclosure; and
 - we failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

5. Roles and Responsibilities

Roles	Responsibilities
RAWCS Board of Directors	<ul style="list-style-type: none"> • Overall responsibility for ensuring this policy complies with our legal and ethical obligations. • Approving this policy and holding the CEO accountable to how effectively this policy is implemented.
Whistleblower Protection Officer	<ul style="list-style-type: none"> • Senior people within RAWCS appointed to oversee adherence and application of this policy and procedure and to be the referral point for all investigations and subsequent board reporting. • Provide mentoring and other support to persons making a report of Reportable Conduct. • Provide protection to persons making a report of Reportable Conduct according to this Policy. • Keeping persons making a report of Reportable Conduct informed of the progress and outcomes of the inquiry/ investigation subject to considerations of privacy of those against whom a disclosure has been made. • Regularly review and report to the Board of Directors to determine whether and what type of organisational action is required to address any underlying trends or patterns.
CEO	<ul style="list-style-type: none"> • May be appointed a Whistleblower Protection Officer for the purposes of this policy and procedure. • Accountable to the Board for overall implementation and monitoring of this policy. • Ensuring this this policy is communicated to our people and this policy is upheld.
National Manager Projects & Volunteer	<ul style="list-style-type: none"> • Ensuring all project participants are aware of, and comply this policy. • Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations.
Investigator	<ul style="list-style-type: none"> • As directed by Whistleblower Protection Officer Investigate reports received from whistleblowers • Update Whistleblower Protection Officer with their investigation results in a timely manner • Maintain confidentiality when handling reports when practical and appropriate in the circumstances, and be objective, fair and independent throughout the investigation process. • Conduct a sufficient and proper inquiry into the content of a Whistleblower report. • Maintain Investigator training and competency
All our people	<ul style="list-style-type: none"> • Meet the obligations in this policy. • Report any past, present or likely future activity or behaviour which is defined as Reportable Conduct as per this Policy.

6. Failure to comply with this Policy

- 6.1.1 Any breach of this policy and procedure by our people may be regarded as misconduct and may result in disciplinary action (up to and including dismissal where relevant).
- 6.1.2 A breach of this policy and procedure may also amount to a civil or criminal contravention under the Australian whistleblower protection laws (in particular, the regime contained in the *Corporations Act* and the *Taxation Administration Act*), giving rise to significant penalties.

7. Policy Distribution

- 7.1 We will ensure that all our people and partners are notified of and made aware that they are required to comply with the policy.
- 7.2 This policy will be publicly available on our website.

8. Review

- 8.1 We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated as required.
- 8.2 Feedback on this and other policies is openly encouraged from our people, partners, stakeholders and the communities we work with. Feedback, as well as emerging good practice and collaborative lessons learnt across the development sector, will be used to strengthen this and related policies and procedures.

9. More information

- 9.1 If you have a query about this policy or need more information, you can contact us via:
- email: info@rawcs.org.au
 - phone: +61 2 8833 8306
 - post: Rotary Australia World Community Service Ltd
25/1 Maitland Place
Maitland Place
Norwest NSW 2153
Australia

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