Whistleblowing Policy

Policy Context
Projects of Promise aims to:

- Allow and encourage safe reporting of misconduct or illegal activity at Projects of Promise
- Uphold Projects of Promise high standard of ethical conduct and financial responsibility
- Outline the process for dealing with the reports and protection of whistleblowers
- Ensure that misconduct is dealt with appropriately

Definitions
Whistleblowing is defined as deliberate, voluntary disclosure of individual or organisational wrongdoing by a person who has access to data, events or information about an actual, suspected or anticipated wrongdoing within the organisation.

Whistleblower refers to any Projects of Promise Board or Committee member, staff member, volunteer or other person connected with Projects of Promise (such as a person from a partner organisation or interested third party) who attempts to make a report or wishes to report in connection with a wrongful act under this policy and who wishes to avail themselves of the protections offered by this policy.

Wrongful Act includes, but is not limited to:

- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law)
- Breaches of Projects of Promise policy and ACFID (Australian Council for International Development) Code of Conduct to which Projects of Promise is a signatory
- Criminal offences
- Mismanagement of funds
- Actual or suspected fraud
- Abuse of authority
- Disclosures related to miscarriage of justice
- Health and safety risks, including risks to the public as well as other employees
- Damage to environment
- The unauthorised use of organisational funds
- Possible fraud and corruption

- Sexual or physical abuse of program participant
- Other unethical conduct
- The concealment of any of the above

Principles

- All Projects of Promise Board, Committee members, staff and volunteers have an obligation to report wrongful acts in accordance with this policy
- All Projects of Promise Board members, staff and volunteers have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal
- Projects of Promise will respond in a timely, respectful and confidential manner to all disclosure of wrongful acts
- Projects of Promise will adhere to the protection offered under Whistleblowers' Protection Act 2001
- Where it has been assessed that the matter may be subject to a criminal investigation, Projects of Promise will refer the matter to law enforcement agencies

This policy is not intended to replace the procedures in the *Projects of Promise Complaints Policy* for staff to raise any matter they may have in relation to their work or their work environment, other person, or decision affecting their employment.

Protection in Practice

Confidentiality: If a wrongful act or suspected wrongful act is reported under this policy, Projects of Promise will take all reasonable steps to protect the identities of both whistleblowers and alleged perpetrators. Generally, Projects of Promise will not disclose the whistleblower's identity unless:

- The whistleblower consents to the disclosure
- The disclosure is required or authorised by law, and/or
- The disclosure is necessary to further investigations

Reports made under this policy will generally be treated confidentially. However, when a report is investigated it may be necessary to reveal its substance to people such as the Projects of Promise Board, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. At some point it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report.

Unauthorised disclosure of information relating to a report, the identity of the whistleblower or information from which the identity of the whistleblower could be inferred, will be regarded seriously and may result in disciplinary action, which may include dismissal.

Protection of whistleblower: Projects of Promise will protect a whistleblower by:

- Allowing whistleblowers to report suspicions anonymously
- Endeavouring to keep the identities of whistleblowers and alleged perpetrators confidential, and encouraging all parties involved to do the same

- Endeavouring to keep details of the report confidential and storing any physical evidence of the proceedings in a secure place
- Ensuring that a person's participation in a whistleblower investigation will not appear in any employment or personnel records
- Ensuring that a person's participation in a whistleblower investigation will not result in discrimination or disadvantage in their employment
- Providing appropriate protection & support to those who, in good faith, make a report, Projects of Promise Board and management will take all reasonable precautions to store any records relating to a report of a wrongful act securely and to permit access by authorised personnel only

Whistleblowers implicated in a wrongful act: Note: If a report concerns alleged or suspected breach of corporations or securities laws, the recipient of a report under this policy must seek legal advice before disclosing any information at all relating to the report.

Even though a whistleblower may be implicated in the wrongful act, they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy. However, making a report will not necessarily shield the whistleblower from the consequences flowing from that person's involvement in the wrongful act. In some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

False disclosures: Projects of Promise will treat all disclosures of wrongful acts seriously and protect staff who raise concerns in good faith. While protection is provided to whistleblowers under this policy, deliberate false reports will not be tolerated and anyone found making a deliberate false claim or report will be subjected to disciplinary action, which could include dismissal.

Reporting Process: Concerns relating to wrongful acts should be reported to:

- The Executive Officer of Projects of Promise (except where he/she may be involved in the wrongful act); and/or
- The Chair of the Board (except where he/she may be involved in the wrongful act); and/or
- Projects of Promise External Auditors or legal representatives.

Reports can be made in writing or verbally. It is also acceptable to make an anonymous complaint, however, it is noted that this may impede any subsequent investigation.

Upon receiving a report, Projects of Promise will investigate concerns appropriately, and will, where possible, provide feedback regarding the outcome of the investigation and remedial action taken.

The Executive Officer will be responsible for reviewing and implementing any recommendations from the report:

Contact: Executive Officer –

Chairperson: Carlyle Ginger – carl.ginger@projectsofpromise.org

Communication with Whistleblower: Provided the disclosure was not submitted anonymously, the whistleblower will be kept informed of the progress of the investigation. The

whistleblower will be informed of the outcomes of the investigations subject to the considerations of privacy of those against whom the allegations have been made.

Management of a Person Against Whom a Report is Made: Generally, the person who is the subject of any report that is investigated, will:

- Be informed as to the substance of the allegations
- Be given the opportunity to answer the allegations before any investigation is finalised
- Be informed about the substance of any adverse comments that may be included in any report arising from the investigation before it is finalised
- Have their defence set out fairly in any report

Projects of Promise recognises that individuals against whom a report is made must also be supported during the handling and investigation of the alleged wrongful act.

Projects of Promise will take all reasonable steps to ensure the person who is the subject of a report, is treated fairly, particularly during the assessment and investigation process. Support provided by Projects of Promise may include referral to counselling or arranging pastoral care.

Where a person is named by a whistleblower as being suspected of a possible wrongful act but preliminary investigation inquiries determine that the suspicion is baseless or unfounded and that no formal investigation is warranted, then the whistleblower will be informed of this outcome.

Accessibility of this Policy

This policy will be circulated to all Board members, staff and made available on the Projects of Promise website.

Policy Review

November 2025, on change of legislation, or at the discretion of the Board of Projects of Promise.

Policy Version
1.0