POLICY – Whistleblower

Policy Title	**Country Education Foundation Whistleblower Policy**
Policy Number	Governance 1.006
Version Number	2
Originally Approved	3/9/2019
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Policy Officer	Operations Manager
Responsible Person/s	Chief Executive Officer (CEO)
Scope	CEF board, staff and volunteers. CEF supported students and alumni
Purpose	Country Education Foundation of Australia Pty Ltd ACN 103 889 452 (CEF) provides this policy to: 1. encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss CEF or damage to its reputation; 2. enable CEF to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for the secure storage of the information provided; 3. establish the policies for protecting whistleblowers against reprisal by any person internal or external to the entity; 4. provide for the appropriate infrastructure; 5. help to ensure CEF maintains the highest standards of ethical behaviour and integrity.

POLICY STATEMENT

1. Definition

1.1. A whistleblower is a person, being a director, manager, employee, contractor, supplier, volunteer or student of CEF, who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with reportable conduct and wishes to avail themselves of protection against reprisal for having made the report.

1.2. Breaches of general law, CEF policy, or generally recognised principles of ethics include:

1.2.1. corrupt conduct;

1.2.2. fraud or theft;

1.2.3. official misconduct;

1.2.4. maladministration;

1.2.5. harassment or unlawful discrimination;

1.2.6. serious and substantial waste of public resources;

1.2.7. practices endangering the health or safety of the staff, volunteers, students or the general public;

1.2.8. practices endangering the environment; or

1.2.9. practices threatening the good standing and reputation of CEF within the community.

1.3. Complaints regarding occupational health and safety should where possible be made through the CEF's occupational health and safety procedures.

2. Concerns regarding illegal or corrupt behaviour

2.1. Where an employee of CEF believes in good faith, on reasonable grounds that any other employee, volunteer, students or contractor has breached any provision of the general law that employee must report their concern to:

2.1.1. the CEO; or

2.1.2. the Chairman of the Board, if they feel that the CEO may be complicit in the breach;

2.1.3. a person or office independent of CEF nominated by the organisation to receive such information; or

2.1.4. the duly constituted authorities responsible for the enforcement of the law in the relevant area.

2.2. The person making their concern known shall not suffer any sanctions from CEF on account of their actions in this regard provided that their actions:

2.2.1. are in good faith;

2.2.2. are based on reasonable grounds; and

2.2.3. conform to the designated procedures.

2.3. Any person within the organisation to whom such a disclosure is made shall:

2.3.1. dismiss the allegation if they believe the behaviour complained of to be unquestionably trivial or fanciful, and notify the person making the allegation of their decision; or

2.3.2. ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding if they believe the behaviour complained of to be neither trivial nor fanciful.

1.4 Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

1.5 Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the organisation.

3. Concerns regarding improper or unethical behaviour

3.1. Where an employee of CEF believes in good faith, on reasonable grounds that any other employee, volunteer, student or contractor has breached any provision of CEF's constitution, or its bylaws, or its policies, or its code of conduct, or generally recognised principles of ethics, that employee may report their concern to:

3.1.1. the CEO; or

3.1.2. the Chairman of the Board, if they feel that the CEO may be complicit in the breach; or

3.1.3. a person or office independent of the organisation nominated by CEF to receive such information.

3.2. The person making their concern known shall not suffer any sanctions from CEF on account of their actions in this regard provided that their actions:

3.2.1. are in good faith;

3.2.2. are based on reasonable grounds; and

3.2.3. conform to the designated procedures.

3.3. Any person within CEF to whom such a disclosure is made shall:

3.3.1. dismiss the allegation if they believe the behaviour complained of to be unquestionably trivial or fanciful, and notify the person making the allegation of their decision; or

3.3.2. ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding if they believe the behaviour complained of to be neither trivial nor fanciful.

3.4. Any such investigation shall observe the rules of natural justice procedural fairness.

3.5. Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by CEF.