

- Regular, at least annual training of the Whistleblowing Policy & Procedure will be undertaken across ChildFund offices.

Policy in Action

Confidentiality

If Reportable Conduct is raised under this policy, ChildFund will endeavour to protect the Whistleblower's identity. In order not to jeopardise the investigation into the alleged wrongful act, the Whistleblower is also expected to keep the fact they have raised a concern, the nature of the concern and the identity of those involved confidential.

ChildFund will not disclose the identity unless:

- the Whistleblower consents to the disclosure;
- the disclosure is required or authorised by law, and/or
- the disclosure is necessary to further the investigation.

Reportable Conduct raised under this Policy will be treated confidentially. However, when a matter is investigated it may be necessary to reveal its substance to people such as other ChildFund personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. Where there is a suspicion of criminal offence, the matter should be reported to the appropriate law enforcement agency even before the investigation is concluded and be guided by such an agency as to the appropriate actions.

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 Reportable Conduct.

ChildFund will take reasonable precautions to store any records or files relating to a matter of Reportable Conduct securely and to permit access by authorised only.

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

Protection of Whistleblowers

No employee who raises genuinely held concerns in good faith under this Policy will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes, but is not limited to, unwarranted disciplinary action and victimisation in any of the following forms:

- dismissal
- demotion
- any form of harassment
- discrimination
- loss of business or service (for non-employees)
- current or future bias
- threats of any of the above

Any such retaliatory action will be treated as serious misconduct and will result in disciplinary action which may include dismissal. If a Whistleblower believes retaliatory action has occurred or has been threatened, the Whistleblower has the right to make a submission to the Whistleblower Protection Officer or the Chair of the ChildFund Audit, Risk and Governance Committee. This Committee Chair is independent of management and will arbitrate the matter.

Whistleblowers implicated in Reportable Conduct

Even though a Whistleblower may be implicated in Reportable Conduct, they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for raising a matter under this Policy. ChildFund will provide the necessary support to any Whistleblower throughout the process.

However, raising Reportable Conduct will not necessarily shield the Whistleblower from the consequences flowing from that person's involvement in the matter. In some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

False disclosures

ChildFund will treat all disclosures of Reportable Conduct seriously and protect those who raise concerns in good faith. However, 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.

Procedure for raising Reportable Conduct

If People believe that the actions of any person (or a group of people) working or volunteering for ChildFund do or could constitute Reportable Conduct they should raise the matter via the appropriate channel. The avenues for reporting are:

- Directly to the Whistleblower Protection Officer (EMAIL#).
- Directly to the Chair of the ChildFund Audit, Risk and Governance Committee (EMAIL#).
- Via the website _____ (accessible by the Whistleblower Protection Officer only). This can be anonymous if the Whistleblower prefers.
- Directly to any appropriate regulator or authority.

People may raise their concerns verbally or in writing and should include full details together with any supporting evidence that may be available. They should state they are using the Whistleblowing Policy and specify whether they wish for their identity to be kept confidential. People choosing to raise their concerns in writing should use the template provided (see Appendix A).

How a disclosure will be handled

All disclosures will be taken seriously and the following procedure will be used:

1. The Whistleblower must disclose at the outset, any personal interest they may have in the matter. This must include full disclosure of any involvement the Whistleblower has had in the matter.
2. A Whistleblower Investigation Officer will be appointed to manage the disclosure. The Whistleblower Investigation Officer may engage the services of an external party to support the investigation where necessary providing such approval has been granted by the Whistleblower Protection Officer. Such appointment would be subject to a confidentiality undertaking by the external party.
3. The Whistleblowing Protection Officer commits to scrutinise the case upon receipt of the initial allegation and take immediate action in cases where this is deemed warranted (e.g. child exploitation suspicions, serious fraud suspicions). In all other cases ChildFund undertakes to start the investigation within 14 days of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed

investigation to take place or whether the disclosure is, for example, based on erroneous information.

4. The Whistleblower may be asked to provide more information during the course of the investigation.
5. The Whistleblower Investigation Officer investigating the disclosure will prepare an investigation report that will be reviewed by the Whistleblower Protection Officer.
6. Appropriate action will be decided by the Whistleblower Protection Officer in discussion with relevant senior managers. Action may include: initiating a disciplinary process, or informing external authorities if a criminal action has been committed or suspected of being committed, e.g. fraud or theft.
7. If referral to an external authority is necessary, the CEO will be advised and the Whistleblower will be informed. If ChildFund considers it appropriate to do so, such a referral may need to be made without the Whistleblower's knowledge or consent.
8. If it is found that there is not sufficient evidence of, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be appropriate for the manager to take a more informal approach to dealing with the matter. In this circumstance possible outcomes of the investigation could be that:
 - a. The allegation could not be substantiated; or
 - b. Action has been taken to ensure that the problem does not arise again.
 - c. A more applicable policy and procedure is applied to the matter
9. If the Whistleblower is not satisfied with the response they have received they have the option to raise the matter with the CEO, the Whistleblower Protection Officer or the Chair of the ChildFund Audit, Risk and Governance Committee of the ChildFund Board.

Corrective action and compliance

Should allegations be found to be unsubstantiated, every effort will be made to address any negative effects on the reputation and morale of staff members involved. As part of the investigation into disclosures made under this Policy, recommendations for change will be invited from the Whistleblower Investigation Officer and/or the Whistleblower Protection Officer to enable ChildFund to minimise the risk of the recurrence of any Reportable Conduct that has been disclosed. The Chief Executive Officer, or a designated Senior Manager, will be responsible for reviewing and implementing these recommendations.

Communication with the 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 investigation 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:

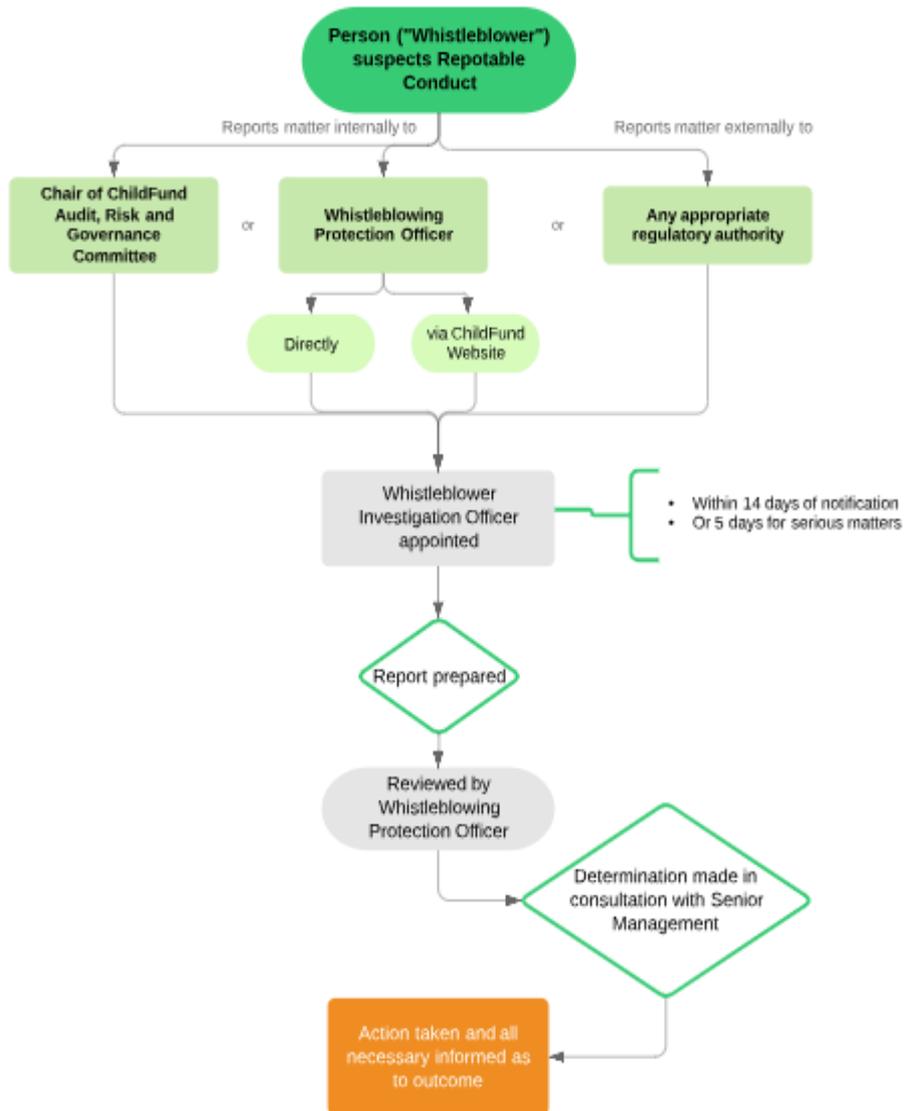
- be informed as to the substance of the allegations;
- be given the opportunity to answer the allegations before any investigation is finalised;
- be informed about the substance of any adverse comments that may be included in any report arising from the investigation before it is finalised;
- have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

ChildFund recognises that individuals against whom a report is made must also be supported during the handling and investigation of the alleged reportable conduct. ChildFund will take 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 ChildFund may include referral for counselling.

Where a person is named by a Whistleblower as being suspected of possible Reportable Conduct but preliminary 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 and the matter laid to rest.

Where an investigation does not substantiate the report, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the report must be handled confidentially.

Procedure Flowchart



The ChildFund board is advised of all proven Reputable Conduct matters and actions taken.

APPENDIX A – Whistleblower Report

Note: If you wish to remain anonymous do not complete items 1 – 4 of this questionnaire

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> I authorise the use of the information provided in this report in accordance with the Whistleblowing Policy | <input type="checkbox"/> I would like a summary of my concerns and proposed action to be provided to me | <input type="checkbox"/> I have a preference that the WPO is Female
<input type="checkbox"/> I have a preference that the WPO is Male | <input type="checkbox"/> I have no preference as to the gender of the WPO |
|--|---|--|---|

1.	Please state your full name	
2.	Please state <ul style="list-style-type: none"> ▪ your position title ▪ and your office location 	
3.	What is your work telephone number and email address?	
4.	What is the name of your immediate manager?	
5.	Please describe in detail the matter you would like to disclose	
6.	How was the matter discovered?	
7.	Over what period of time has the suspected activity occurred?	
8.	Why do you consider this matter to be a wrongful act?	

9.	Please name all the people involved in the suspected wrongful act	
10.	Are there any witnesses? If "yes" please state their names:	
11.	Do you have any supporting evidence?	
12.	Where is the evidence located?	
13.	Is the evidence in danger of being lost or destroyed?	
14.	Please explain how this evidence can be retrieved → by the person involved in investigating the matter, OR → provide the evidence with your report.	
15.	Have you been told about this matter by someone else?	
16.	Who else knows about this matter?	
17.	Please state (in detail) if you have any concerns regarding reprisals or recriminatory action taken or that might be taken against you.	
18.	Please include any other details which you believe are relevant. This should include whether you have any personal interest in the matter.	