

## 1. PURPOSE

To describe the procedures supporting the IWDA Whistleblower Policy.

## 2. SCOPE & DEFINITIONS

As per the IWDA Whistleblower Policy.

## 3. PROCEDURE

### 3.1. What should be reported

Reportable Conduct. Where any person has reasonable grounds to suspect any misconduct or an improper state of affairs or circumstances (*Reportable Conduct*) IWDA encourages them to raise their concerns, either informally or formally as a Whistleblowing report.

Reportable Conduct does not include personal and/or work-related grievances, which are addressed Grievance and Conflict Resolution Policy and procedure.

See the Whistleblower Policy for examples of Reportable Conduct.

### 3.2. How should it be reported

IWDA has a number of formal and informal ways in which concerns can be raised depending on the circumstances and the level of seriousness of the issue.

#### 1. Informal disclosure

For many issues, people are comfortable discussing their concerns informally with their manager or another trusted person within IWDA, and IWDA promotes to a culture where concerns can be discussed openly and transparently. Accordingly, IWDA encourages people with a concern to raise their concerns informally with their manager or another trusted person within IWDA.

IWDA's Complaints Policy or (for staff) the Grievance and Conflict Resolution Policy contain further details on how you may raise concerns outside of this Policy

#### 2. A Whistleblowing report

A formal whistleblowing report can be made under the Whistleblower Policy to the following people, depending on the circumstances:

- i) the persons supervisor within IWDA;
- ii) the IWDA CEO, member of the IWDA Leadership team or board chair;
- iii) the IWDA auditor or the Australian Securities and Investments Commission if appropriate.

The report should provide as much information as possible. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information which may be helpful to assist IWDA to determine how to take appropriate action.

People are encouraged to share their identity when making a disclosure, as it will make it easier for IWDA to address the disclosure, but they are not required to do so and may report anonymously. If they choose not to share their identity, IWDA will assess the disclosure in the same way as if they had revealed their identity. However, there may be some practical limitations in conducting the investigation.

Any person wishing to report in writing and/or maintain anonymity can report through either email or mail to the following addresses – marked private and confidential:

- [ethics@iwda.org](mailto:ethics@iwda.org)
- Mail Address: IWDA Whistleblower Committee (private and confidential), PO Box 64, Flinders Lane VIC 8009 Australia

### 3.3. What will happen next

- a) The person receiving the report must:
  - iv) keep a note of the discussion; and
  - v) disclose the report as soon as practicable to the IWDA Whistleblowing Committee.
- b) The Whistleblower Committee will as soon as practicable:
  - i) identify whether the disclosure falls within the scope of the IWDA Whistleblower Policy;
  - ii) notify the Chair of the IWDA Board;
  - iii) identify whether there are grounds for proceeding with a detailed investigation;
  - iv) where an investigation is to be undertaken, appoint the investigating officer or team to carry out the investigation. The same may be internal or external;  
Internal : As deemed appropriate, an internal investigation may be led by:
    - the manager or director of the person who has made the report;
    - the Whistleblower Committee; or,
    - member/s of the Board of DirectorsExternal: If deemed appropriate to have an external and independent body undertake an investigation into the incident, the Committee will appoint a third party to conduct the investigation.
  - v) identify whether there is a need to notify external parties:
    - Report to police and or child protection authority
    - Report to DFAT or other donor agency (e.g. if any DFAT funded personnel, or DFAT partner personnel, are accused of, charged with, arrested for, or convicted of criminal offences relating to child exploitation and abuse) as required.
    - If the complaint or concern relates to a person employed by an IWDA partner organisation, subject to obligations of confidentiality, IWDA's Chief Executive Officer, or her delegate, will discuss the allegations with the partner organisation's Chief Executive Officer and decide together upon the next steps.
  - vi) inform the person making the report whether the disclosure falls within the scope of the Whistleblower policy and whether IWDA will be proceeding with a detailed investigation.

### 3.4. Investigation Process

IWDA will undertake a prompt impartial and appropriate investigation based on our internal policies and the nature and complexity of the matter, to determine what action, if any, should be taken in the circumstances. In particular:

- a) IWDA will treat all concerns raised seriously and ensure that all parties will be treated fairly in accordance with the principles of natural justice. All reports will be handled professionally, confidentially and expediently.
- b) The protections for confidentiality and against Detrimental Conduct will apply as per the Whistleblower Policy.
- c) A prompt, impartial and appropriate investigation shall be carried out, to determine what action, if any, should be taken in the circumstances.
- d) The person undertaking the investigation shall request all critical information in order to effectively evaluate and investigate the matter.
- e) Before any adverse finding, the subject of the report shall be informed of the allegations against her and provided with an opportunity to reply to the allegations.
- f) At an appropriate time the person making the report may be asked to comment on any additional evidence obtained/and or the need to be a witness.
- g) All reports raised and action taken in response will be recorded and will be retained securely in the IWDA Whistleblowing Register. Access to the Whistleblowing Register is restricted to the Whistleblowing Committee and members of the Board of Directors.
- h) If at the conclusion of the investigation, the allegations disclosed are considered to be substantiated, effective remedial action, commensurate with the severity of the offence will be taken.
- i) All employees and other persons covered by the Whistleblowing Policy must assist in the investigations as required. Where a person fails to co-operate or deliberately provides misleading information to the investigation, they will be subject to disciplinary action.

### 3.5. Protection for individuals who report

- a) As described in the Whistleblower Policy IWDA will make all reasonable endeavours to keep the identity of the person making the disclosure confidential unless that disclosure is authorised by the disclosing person or required by DFAT or the law.
- b) IWDA strictly prohibits all forms of Detrimental Conduct against any individual making a disclosure covered by the Whistleblower Policy, as well as any people who are involved in an investigation of such a disclosure, and it will take all reasonable steps to protect them from Detrimental Conduct.
- c) If any person makes an allegation in good faith which is not confirmed by the investigation no action will be taken against her or him. If, however, any person makes an allegation frivolously, maliciously or for personal gain, appropriate disciplinary action and/or reporting the matter to the police may result.
- d) Where the investigation has found that the person making the allegation acted in good faith on reasonable grounds, the CEO shall designate an officer from IWDA to be responsible for protecting the person from Detrimental Conduct by IWDA or its personnel and to providing additional support for the person where necessary.

#### **4. IMPLEMENTATION**

The Chief Executive Officer, in conjunction with the IWDA Leadership team and People and Culture, is responsible for the administration, revision, interpretation, and application of this procedure.

A copy of this procedure shall be placed on IWDA's shared drive for staff.

#### **5. REVIEW AND AMENDMENT**

This procedure will be reviewed every 3 years to ensure it remains compliant with law, relevant and effective. This procedure may be amended at the discretion of the Chief Executive Officer.

#### **6. REFERENCES/RELATED DOCUMENTS**

IWDA Whistleblower Policy  
IWDA Complaints Process (external)