Appendix 17. Whistleblower Policy

(Next review by July 2029)

Policy number	17	Current policy version	3
Original policy approved	July 2020	Previous review date	June 2026
Current policy reviewed by CEO	CC	Current version approved by Committee of Management on	July 2026
Responsible person	CEO	Scheduled review date by	July 2029

Introduction

Assisi Aid Projects (Assisi) is committed to accountability and transparency and encourages the reporting of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving the organisation, and the organisations and individuals with which Assisi works. The organisation provides protections and measures so that people who make a report can do so in confidence, and without fear of retribution.

Assisi does not tolerate unethical, illegal, or fraudulent behaviour of any kind. Assisi is a signatory to the ACFID Code of Conduct and is committed to working in a transparent way, and to taking seriously any reports of conduct that contravene its values.

Purpose and Principles

The purpose of this policy is to provide a supportive environment where misconduct within or by Assisi can be raised without fear of retribution.

Assisi recognises that people who have a working relationship with the organisation are often the first to realise there may be concerns. Assisi expects that all Assisi "personnel" have a responsibility to disclose information of possible wrongdoing and in doing so, no individual should be personally disadvantaged for reporting a wrongdoing in good faith.

Assisi is committed to maintaining an environment where legitimate concerns can be reported without fear of retaliatory action or retribution. When a person makes such a disclosure, they are entitled to expect that:

- Their identity always remains confidential to the extent permitted by law or is practical in the circumstances. Penalties may be imposed if a whistleblower's identity is revealed.
- They will be protected from reprisal, harassment or victimisation for making the report and may be compensated if they receive detriment.

- Should retaliation occur for having made the disclosure, Assisi will treat it as serious wrongdoing under this Policy, and its workplace grievance procedure.
- Fair and impartial procedures will be established that enable protection for those that make serious misconduct disclosures.
- An independent internal inquiry/investigation in relation to the disclosures made will be conducted.
- Resolution of the issue(s) identified will be prioritised, and where appropriate shared with the individual who made the report.

As part of the Assisi onboarding process, personnel will be briefed in this policy and how to make a complaint. This policy is closely associated with a number of other Assisi policies and guidelines and should be read in conjunction with Assisi's Code of Conduct, Anti-Fraud and Anti-Corruption Policy, Child Protection Policy and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, and the sections of the Assisi Good Practice Manual related to Workplace Grievances, and Complaints.

Scope

This policy applies to Assisi's staff, members, Governing Body members (both Committee of Management and subcommittee members), volunteers, representatives, contractors and visitors to project sites, which will be hereinafter referred to as "personnel". The Policy also applies to Assisi's overseas partner organisations and must be supported via a local organisational policy and reporting process. Overseas partner staff are also able to utilise the Assisi Whistleblower Policy to raise issues directly to Assisi, in relation to the work being undertaken by Assisi or the people or projects being supported.

Assisi is committed to working with its in-country partner organisations to support partners to strengthen their own whistleblowing policies and practices to ensure that the Assisi Whistleblower Policy is adhered to throughout the delivery of Assisi's programs and projects.

Definitions

Whistleblowing:	The disclosure by or for a witness, of actual or suspected misconduct in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.
Whistleblower:	Someone with inside knowledge of an organisation who reports misconduct or dishonest or illegal activity that may have occurred within that organisation.
Whistleblower protections:	Protections provided to whistleblowers to enable them to come forward to report misconduct without fear of retribution or personal detriment. It is illegal to fire, harass or discriminate against a whistleblower or potential whistleblower because someone thinks they made a disclosure (whistleblowers can be compensated for any loss, damage, or

	injury they suffer, and people breaching whistleblower confidentiality or causing detriment can face criminal or civil penalties).
Misconduct:	Includes behaviour that: is fraudulent or corrupt (as defined under the Assisi Anti-Fraud and Anti-Corruption Policy or the laws of the country the action is taking place in, or the regulatory requirements of Australia or the country that the activity takes place in) is illegal, is unethical, such as acting dishonestly; altering company records; wilfully making false entries in office records; engaging in questionable accounting practices; or wilfully breaching Assisi's Code of Conduct or the ACFID Code of Conduct; is potentially damaging to Assisi, such as maladministration, is seriously harmful or potentially seriously harmful to staff, volunteers, or the general public such as deliberate unsafe work practices or wilful disregard to the safety of others in the workplace may cause serious financial or non-financial loss to Assisi; or damage its reputation; or be otherwise seriously contrary to this Policy or involves any other kind of serious impropriety including retaliatory action against a whistleblower for having made a wrongdoing disclosure.

A personal work-related grievance related to current or former employment would generally be covered by Assisi's Good Practice Manual procedure for workplace grievances.

Complaints regarding occupational health and safety should as a general rule be made through the Assisi Occupational Health and Safety procedures outlined in the Good Practice Manual.

Relevant Codes and Legislation

A number of legislative and other frameworks and standards apply to this policy:

- Corporations Act 2001
- Taxation Administration Act 1953
- G20 Commitment to Whistleblowing (2010 Seoul Summit)
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
- As a signatory to the ACFID Code of Conduct, Assisi is committed to protecting the human rights and safety of its employees and volunteers by enabling them to report wrongdoing through fair, transparent and accessible procedures (Quality Principle 9 People and Culture: Commitment 9.2).
- As a DFAT-accredited NGO, Assisi is also required to comply with DFAT standards relating to protection of whistleblowers, specifically, DFAT Accreditation Criteria A2.4: ANGO has established public-facing complaints handling, whistleblowing and incident management systems that are accessible to all stakeholders

Reporting Procedure

The Chief Executive Officer (CEO) is responsible for the development and implementation of this policy and is the key contact point for any reports or complaints that are made. The CEO can be contacted via email to assisi@assisi.org.au or +61 452 065 747.

The Assisi Committee of Management is responsible for adopting this policy.

All Assisi personnel will be made aware of this policy and their responsibilities to report wrongdoing to the CEO. It is the responsibility of the CEO to ensure all staff are adequately trained in understanding, identifying and (where possible) mitigating any activity that may breach the definitions of fraudulent, corrupt or illegal behaviour.

Assisi's overseas partners will be made aware of its Whistleblower Policy during the partner assessment process, and during training and orientation on key Assisi policies during field visits. The requirement for the development of a local organisational whistleblower policy will also be included in Memorandums of Understanding with partners.

All Assisi stakeholders will have access to this Policy via the Assisi website. Participant communities will also be made aware of the whistleblowing policy and reporting procedures (in the local language) during the project planning, implementation and review process.

Where a whistleblower suspects wrongdoing on objectively reasonable grounds, that person may report their concern to the Assisi CEO. Reports must be as thorough as is possible. False or malicious allegations may result in disciplinary action.

Where it is not possible or appropriate to report suspicion of misconduct to the CEO, or, if they feel that the CEO may be complicit in the breach, reports should be raised directly to the President of the Committee of Management (email: elizabeth.morris@assisi.org.au) who will then appoint an alternative investigator.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by Assisi, except where it may be overridden by due process of law. Where anonymity has been requested the complainant is required to maintain confidentiality regarding the issue on their own account and to refrain from discussing the matter with any unauthorised persons.

A whistleblower must provide information to assist any inquiry/investigation of the wrongdoing disclosed. This should include details of:

- The nature of the alleged breach.
- The person or persons responsible for the breach.
- The facts on which the whistleblower's belief that a breach has occurred, and has been committed by the person named, are founded.
- The nature and whereabouts of any further evidence that would substantiate the whistleblower's allegations, if known.

Disclosures will be treated confidentially and sensitively with immediate steps taken to protect the identity of the whistleblower. This will include redacting names and positions from any written record and ensuring that appropriate document security is implemented.

Assisi Aid Projects will seek to ensure that whistleblowers are not subjected to detrimental treatment as a result of making (or intending to make) a disclosure under this policy. Detrimental treatment could include dismissal, demotion, harassment, damage to your reputation, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a disclosure.

If the allegation is a reportable offence, the CEO is responsible for reporting the allegation to the relevant body including the Police, DFAT, ASIC or APRA in accordance with their guidelines.

An investigation plan will be developed to ensure all relevant questions are addressed. The investigation is in proportion to the seriousness of the allegation(s) and sufficient resources are allocated. 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 whistleblower and further support is provided to that person if necessary.

While a whistleblower may be implicated in the wrongdoing, they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy. It is important to note that making a report does not absolve the whistleblower from the consequences of any involvement on their part in the wrongdoing itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy. Principles of procedural fairness (natural justice) will be observed*

1. The CEO must keep the whistleblower informed of the progress and outcomes of the inquiry/investigation, subject to considerations of privacy of those against whom allegations have been made. The internal investigator may seek the advice of internal or external experts as required. These procedures do not authorise any personnel to inform commercial media or social media of their concern, and do not offer protection to any Assisi personnel who does so.

2. A report will be prepared when an investigation is complete. This report will include:
   - The allegation/s.
   - A statement of all relevant findings of fact and the evidence relied upon in reaching any conclusions.
   - The conclusions reached (including the damage caused, if any, and the impact on the organisation and other affected parties) and their basis.
   - Recommendations based on those conclusions to address any wrongdoing identified and any other matters arising during the investigation.

A summary report will also be provided to the person making the allegation, ensuring the protection of identities of any persons requiring protection, and with, if necessary, any applicable confidentiality stipulations.

The CEO will provide a register to the Assisi Committee of Management through the Finance & Risk Committee, summarising the protected disclosures received, at least once a year or more frequently as required, protecting confidentiality, anonymity and any information which might make possible the identification of the whistleblower in any way.

If an associate of a partner organisation would like to report a grievance or unlawful incident, they should first report to their own organisation, where safe to do so. If the whistleblower is unsatisfied with the response of their organisation, they may then report the matter to the Assisi Aid Projects CEO or President.

If a partner organisation receives a whistleblower complaint or grievance, they should immediately disclose the report to Assisi Aid Projects, in writing to the Assisi Aid Projects CEO. Assisi Aid Projects will work with partner organisations to strengthen their grievance processes where possible. Where the report is related to DFAT funding, Assisi is required to report the incident to DFAT within 24 hours and submit a detailed investigation within five days of receiving the report.

* Natural justice and procedural fairness do not require that the person affected be informed of the identity of the person making the initial disclosure, unless that communication constitutes part of the evidence relied upon in making the eventual finding.

Reports can be made in person or by telephone, post or email at any time.

If you prefer, you can discuss the issue with a person you trust, and this person can make the complaint on your behalf. If, at any time, you are not sure about whether to make a protected disclosure, you can get independent legal advice. Any discussions you have with a lawyer will be protected under this policy and under Australian law, or if in other countries, under local law.

If you need help and wish to remain anonymous, Assisi will assist you to make a complaint by providing access to a third party or staff member not associated with your complaint and if requested, will refer you to medical, social, legal or financial services as applicable.

When making a complaint, provide as much detail as possible about the complaint and if you can, explain the outcome you are seeking to rectify this matter.

Please address your complaint to the relevant Project Manager or the person’s immediate supervisor. If the complaint is about Assisi Aid Projects, direct your complaint to the Chief

Executive Officer: Ross House, 247-251 Flinders Lane, Melbourne, Victoria 3000 Australia. Tel +61 452 065 747. Email: assisi@assisi.org.au

Assisi partners with the Federation of Business & Professional Women Nepal (BPW Nepal) and Dreamdelion in Indonesia. Complaints relating to these partnerships and associated programming can be lodged at assisi@assisi.org.au.

Complaints related to Assisi partner organisations can also be lodged directly with that partner in country:

Nepal Programs
Federation of Business and Professional Women Nepal
77 Bhrigu Marg
Buddhanagar - 10
Kathmandu
Nepal
Tel: +977 9841814928
Contact: President: Kamalesh L. Rajbhandary
Email: kamalesh@bpwnepal.org.np
FBPW Email: fbpwn@bpwnepal.org.np

Indonesia Programs
Dreamdelion Indonesia
Rumah Sejati Dreamdelion
Jl. Jogorogo, Gentong, Kec. Paron, Kabupaten Ngawi
Jawa Timur, Indonesia
Postal Code: 63253
Tel: +62 81286069639
Contact: Alia Noor Anoviar
Email: alia@dreamdelion.com

India Programs
SAFA Society
Light House, 2nd Floor
Opp. Balshetty Keth Ground
Noorkhan Bazar, Darul Shifa
Hyderabad, 500024
Tel: +91 9866174665
Contact: Rubina Nafees Fatima
Email: rubina@safaindia.org

Assisi Aid Projects is a signatory to the ACFID Code of Conduct, a voluntary, self-regulatory code that sets out an organisation's commitment to conducting its activities with integrity and accountability. If your complaint is concerning Assisi Aid Projects not complying with

the ACFID Code of Conduct, you can lodge a complaint with the ACFID Code of Conduct Committee directly as per the process outlined on the ACFID website.

Reference List

In developing this policy Assisi referred to the following policy and guidance documents that were generously shared by other organisations:

ACFID Code of Conduct: Commitment 7.3.3. and 9.2

So They Can Whistleblowing policy

UNICEF Australia Whistleblower policy

CPA Australia A good practice guide to whistleblowing policies

ACFID Whistleblowing submission February 2017