
WHISTLEBLOWER POLICY

1. **Purpose**

Each of us in Red Cross is committed to our values and the Fundamental Principles, as the basis of our activities to achieve our mission.

Consistent with our values and Fundamental Principles, Red Cross has a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations and Red Cross policies. Those standards are reflected in the Ethical Framework for all Red Cross People. A key part of supporting ethical standards is enabling Red Cross People to speak up about unethical conduct (including unlawful conduct).

This policy promotes and supports a culture of ethical behaviour at Red Cross.

2. **Scope**

This policy applies to all Red Cross People, other than those engaged by the Australian Red Cross Blood Service (which has a separate Whistleblower Policy).

Red Cross People include any member of a governance body (members of the Board and of Divisional Advisory Boards and their committees), members, volunteers and staff.

3. **Being safe to speak up about concerns of unethical conduct**

a. Red Cross People

Red Cross aims to create an environment and culture where all Red Cross People feel free and safe to speak up when there are reasonable concerns that, in a significant way, Red Cross or Red Cross People are not acting ethically or in accordance with laws and obligations.

Ethical standards mean that we must comply with laws (such as those prohibiting fraud or corruption); they also mean that anything beyond trivial breaches of Ethical Framework requires action.

Red Cross has adopted this policy to support your freedom to speak up. Ways in which to raise a concern are set out in Section 5.

b. Other People

Any other person who has a reasonable concern that a Red Cross Person may not be acting ethically or in accordance with laws and other obligations may raise that concern by contacting the STOPLINE. <http://redcross.stoplinereport.com>.

4. What is unethical conduct?

The Ethical Framework guides every Red Cross Person about what constitutes ethical behaviour. This Policy provides support for Red Cross People to disclose unethical conduct. Trivial breaches of reasonable standards do not need to be disclosed.

Examples of unethical conduct include:

- breach of the Red Cross Ethical Framework
- breach of a Red Cross policy
- non-disclosure of a conflict of interest
- improper use of position
- breach of laws or regulations
- violence or harassment
- theft
- damage to property
- fraud
- corruption
- dishonesty
- receiving or paying a bribe or kickback
- falsification or destruction of documents or other records
- deliberate mismanagement of the resources of Red Cross
- improper behaviour relating to financial, audit or accounting requirements
- deliberately or recklessly partaking in unsafe working practices
- willful disregard for the safety of others in the workplace
- conduct substantially detrimental to the interests, or to the reputation, of Red Cross
- concealment of unethical conduct
- retaliatory activity against a person who has disclosed unethical behaviour in good faith.

Unethical conduct may constitute a criminal or other offence. Unethical conduct may also occur without any offence having been committed.

5. Speaking up – a Red Cross Person raising a reasonable concern about unethical conduct

Any Red Cross Person may raise a reasonable concern with Red Cross about unethical conduct in two ways:

1. by speaking with a **responsible person**, as set out below; or
2. by contacting STOPLINE on an anonymous basis.

If you want to raise a concern, you must do so in good faith and provide as much information as you know to support the concern. The concern should not be based on suspicion alone.

Both you, and the person you raise the concern with, must treat it confidentially.

This policy does not prevent any Red Cross Person from reporting any unlawful conduct to any relevant external regulatory body or other external authority, such as the police.

First way: Who is a responsible person

- If you are an **Staff** or **volunteer**: discuss the concern with your manager.
- If you are a **member of a governance body**: discuss your concern with the Chair of your Divisional Advisory Board or the Chair of the Audit & Risk Committee.
- If you are a **member** of Red Cross: discuss your concern with your relevant Divisional membership coordinator.
- Formal acknowledgement of the concern must be provided to the whistleblower by the responsible person.

Second way: Contacting the STOPLINE

a. Red Cross People

If you do not feel comfortable with raising a concern about unethical behaviour with a responsible person, you may raise the concern with Red Cross by contacting the STOPLINE :
<http://redcross.stoplinereport.com>.

A concern raised in this way is treated confidentially. It will only be treated as an anonymous concern if you ask for that option (refer to next section – section 6).

b. Other People

If you are not a Red Cross Person, you may raise a concern by contacting the STOPLINE
<http://redcross.stoplinereport.com>.

A concern raised in this way is treated confidentially, but your concern is not treated as anonymous unless you choose the option of raising the concern anonymously (refer to next section).

6. Raising concerns anonymously - contacting the STOPLINE

A Red Cross Person may raise a reasonable concern of unethical behaviour anonymously by contacting the STOPLINE. <http://redcross.stoplinereport.com>.

7. Protection of a person who raises a concern of unethical behaviour

If you raise a concern of unethical behaviour in good faith, you will be protected from any negative consequences or action by anyone on behalf of Red Cross.

Red Cross will take steps to ensure your general welfare, as the person raising the concern, by:

- considering your immediate welfare and protection needs;
- providing information about the process and possible outcomes;
- taking steps to ensure that, where the concern has not been raised anonymously, your identity remains confidential to the extent permitted by law and
- listening and responding reasonably to any concerns of retaliatory activity.

8. **Malicious Reporting**

A Red Cross Person who raises a concern under this Policy maliciously, or who raises the concern without reasonable cause to believe that the concern justified, may be subject to disciplinary action (including employment termination) or other legal action.

9. **Investigation**

A concern which has been raised must be reported by the responsible person to the Chief Executive Officer. If the concern relates to the Chief Executive Officer, it should be reported by the responsible person to the Chair of the Audit & Risk Committee at A&RCChair@redcross.org.au who will immediately inform the President of the Society in a secure manner, or in the case of the matter involving the President, the Deputy President. Likewise if the President is informed in the first instance, they shall report this back to either the CEO and/or the Chair of the Audit & Risk Committee dependent on the circumstances.

For a concern to be investigated, it must include enough information to form a reasonable basis for investigation.

The Chief Executive Officer (or Chair of the Audit & Risk Committee, as the case requires) will decide if an investigation is required.

If an investigation is required, Red Cross will take reasonable steps to investigate while protecting your identity, as the person who raised the concern.

Investigations will be conducted confidentially, fairly, objectively and without bias. Internal or external investigators may be appointed to investigate all reports.

If an investigation starts, Red Cross will confidentially inform you, as the person who raised the concern, keep you generally informed of progress and, give you a summary of the outcome, subject to relevant privacy and confidentiality obligations.

If the concerns are substantiated, then appropriate disciplinary steps or other action will be taken. If the concerns raised have not been substantiated, an explanation will be provided to you, as the person who has raised the concerns, subject to relevant privacy and confidentiality obligations.

10. **Reporting of investigation outcomes**

The Chief Executive Officer (or the Chair of the Audit & Risk Committee, as the case requires) will set out the results of the investigation and the consequential actions in a confidential report to the President.

11. **Provision for review by the President**

After having been informed of the outcome of the investigation, as the person who has raised the concern you may refer the matter to the President [president@redcross.org.au], if:

- you consider that retaliatory action has been taken; or

- you have a genuine and reasonable concern that the disclosure has not been adequately dealt with.

The President may take any further steps as she or he determines in the circumstances are appropriate or, decide not to take any further action.

12. Reporting to external authorities

Once Red Cross is aware of the concern, at any stage Red Cross may choose (or may be required by law) to report the concern to external authorities for investigation (for example, a theft may be reported to the police).

13. Relationship with Red Cross Complaints and Grievance Policy

This policy does not replace Red Cross grievance processes.

Those processes should be followed if a Red Cross Person is aggrieved by the actions of another Red Cross Person which affect the first person in a manner which she or he believes is unfair or unjustified.

Refer HR SUP 16 *Workforce Complaints and Grievance Policy*.

14. Breach of this Policy

Disciplinary action may be taken, in accordance with the relevant provisions, if there is any breach of this policy.

15. Review

This policy is to be reviewed:

- after one year of operation;
- thereafter, after every two years.