

WHISTLEBLOWER POLICY



1. Scope

Sight For All is committed to providing an environment for Board Directors, staff, Visionaries, Fellows, project participants and volunteers that is safe and upholds the highest possible standards of behaviour, good governance, integrity, and transparency at all times.

Sight For All supports and encourages the reporting of suspected incidents of illegal, unethical, fraudulent or undesirable conduct involving the organisation and those representing it. Furthermore, Sight For All supports those who report such incidents confidentially and without fear of retribution.

This policy applies to Sight For All Board Directors, staff, Visionaries, Fellows, project participants and volunteers.

For the purposes of this policy, "Organisational Leader" refers to the most senior employed officer of the organisation (e.g. Chief Executive Officer or General Manager), as appointed by the Board of Directors.

2. Whistleblower Defined

A range of definitions of 'whistleblowing' exist. For the purpose of this policy, Sight For All uses the definition provided by the [Department of Parliamentary Services 2005](#).

"...the disclosure by organisation members (former or current) of illegal, immoral or illegitimate practices under the control of their employers to persons that may be able to effect action".

As an Australian based, not-for-profit organisation, Sight For All is compliant with the whistleblower protections in Part 9.4AAA of the [Corporations Act 2001](#) and the expanded protections of July 2019. These expanded protections provide greater protections for whistleblowers who report misconduct of companies and company officers.

3. Descriptions of Misconduct

For the purposes of this policy, misconduct includes behaviour that is:

- Fraudulent or corrupt
- Illegal
- Unethical, such as the altering of company records and acting dishonestly
- A deliberate act of unsafe work practices causing real or potential harm to others
- Potentially damaging for Sight For All's reputation
- Causing financial or non-financial loss to Sight For All
- Wilfully breaching Sight For All's Code of Conduct and the ACFID Code of Conduct.

4. Purpose of this Policy

The purpose of this Whistleblower Policy is to ensure that Sight For All:

- Encourages and facilitates the disclosure by individuals of wrongdoing without fear of reprisal
- Provides protection from adverse employment consequences for those who, in good faith, disclose perceived wrongdoing
- Provides protection for whistleblowers.

It is the responsibility of the Organisational Leader to ensure that all Sight For All representatives are aware of this Whistleblowing Policy, know how to access the policy, and know how to make a report.

5. Reporting Serious Misconduct

Sight For All believes that individuals reporting serious misconduct should not be victimised or personally disadvantaged. As such, Sight For All maintains an environment where concerns that are legitimate are able to be reported without fear of retribution.

Sight For All Board Directors, staff, Visionaries, Fellows, project participants and volunteers have a responsibility to disclose information.

In accordance with this policy, the process for reporting serious misconduct includes:

- The whistleblower should report instances of, or suspicions of, misconduct to the Organisational Leader in the first instance. If the misconduct involves the Organisational Leader, the whistleblower should report their suspicions directly to the Chair of the Board.
- Upon lodging the report of misconduct, the Organisational Leader will contact the Chair and Chair of the Finance, Risk, Remuneration, Audit and Compliance Committee (FRRACC).
- The Chair, FRRACC Chair and Organisational Leader appoint a delegate to lead the investigation. This person is to be independent and in no way implicated in the report of misconduct. The Chair, FRRACC Chair and Organisational Leader may elect to appoint an external investigator.
- Should the matter involve the Organisational Leader, Chair or FRRACC Chair, another Board Director will be involved in the investigation.
- The external investigator or internal lead investigator undertakes their investigation, keeping the whistleblower, Chair, FRRACC Chair and Organisational Leader informed throughout the process.
- The whistleblower is required to assist in the investigation.
- At the completion of the investigation, the external investigator or internal lead investigator makes their recommendation to the Sight For All Board of Directors at a specially arranged Board meeting.
- The Board of Directors make the determination as to the next steps to be taken as a result of the investigation's findings.

6. Confidentiality

All parties share responsibility for ensuring the matters of the investigation and the investigation process are kept confidential at all times.

In undertaking the investigation, Sight For All is committed to ensuring the confidentiality of:

- The whistleblower
- The identity of the person who is the subject of the disclosure
- The details of the disclosure itself.

7. Whistleblower Protection

The criteria for eligible whistleblowers as outlined in Section 1317AAA of the Act. A person who makes a protected disclosure is protected under the Fair Work Registered Organisations Act 2009.

As outlined on the Fair Work Australia [website](#), Whistleblowers are protected even if the matter is only reported to the registered organisation if it meets certain eligibility and could have been reported to the Commission.

Fair Work Australia describes reprisals as dismissal, discrimination, harassment, disadvantage and damage to reputation. Organisations including Sight For All are aware of the civil penalties for threatening or taking a reprisal for a Whistleblower, including compensation for loss, damage or injury and or order for an apology.

8. Reporting Serious Misconduct In-Country

As the majority of Sight For All's projects are undertaken in-country, there is a need for a process to address the reporting of serious misconduct whilst in a partner country.

Where the report of misconduct involves a Sight For All Board Director, staff member or Visionary, the Fellow, or project participant reporting the misconduct should contact the Organisational Leader via email in the first instance. The Organisational Leader will then arrange a confidential conversation with the Fellow or project participant. The steps outlined in #5 of this policy will then be followed, with an investigator in-country being appointed.

Where the report of misconduct involves a Fellow, project participant or Sight For All staff member based in-country, the Board Director, staff member or Visionary reporting this misconduct should contact the Organisational Leader immediately whilst they are still in-country. This can be done via email and then a conversation will be arranged via video conference. The Organisational Leader will then arrange to liaise with the individual upon their return to Australia. The steps outlined in #5 of this policy will be followed. Again, an investigator in-country may be appointed.

9. Deliberate and False Accusations

An individual making a disclosure of misconduct knowing it to be false:

- Is not afforded any protection under this policy
- May be engaged in misconduct and be subjected to disciplinary action
- May be found guilty of an offence under the Public Interest Disclosure Act 2018.

10. Review

The Sight For All Whistleblower Policy is reviewed on a biennial basis.

11. Related Documents

Sight For All Anti-Fraud and Corruption Policy

Sight For All Child and Young Person Protection Policy

Sight For All Code of Conduct Policy

Sight For All Complaints Handling Policy

Sight For All Incident Investigation and Reporting Policy

Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy

Sight For All Whistleblower Policy
Approved by the Board of Directors
Version 5

Document Revision History		
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