

The Australian Navigators

Whistleblower Policy

Purpose

The objective of this policy is to encourage reporting of wrongdoing that is of legitimate concern by providing a convenient and safe reporting mechanism, and protection for people who make serious wrongdoing disclosures.

Definitions

Whistleblower: A person who reports wrongdoing in accordance with this Policy.

Wrongdoing: Comprises, but is not limited to:

1. Illegal conduct
2. Is dishonest or fraudulent
3. Unreasonably endangers health and safety
4. Has financial or non financial loss detrimental to the interests of the Australian Navigators

Policy Statement

The Australian Navigators is committed to the highest standards of conduct and ethical behaviour and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. We encourage the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving the Australian Navigators and provide protections and measures so that those persons who make a report, whistleblowers, may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Whistleblowers are encouraged to speak about their concerns with their supervisor or their supervisors' manager to seek an immediate response. Where the whistleblower believes this is not appropriate, then a report may be made. A report can be made to any staff member or Board member in any way preferred, including being anonymous.

Information on how reports can be made is published on our website. Also, a link will be provided on the website to a form that can be completed and submitted to register the report.

When a person makes a report:

1. Their identity must remain confidential according to their wishes
2. They will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure
3. Any retaliation for having made a report is serious misconduct and subject to disciplinary action.
4. An independent internal inquiry or investigation will be conducted
5. Issues identified from the inquiry/investigation will be resolved and/or rectified
6. They will be informed about the outcome

Whistleblower Responsibilities

Protection is afforded to whistleblowers who report wrongdoing that is made with grounds to believe it is true.

To ensure that all employees are treated fairly and that resources are not wasted, protection will not be afforded where the report is:

1. Trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.
2. Unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. These will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

A whistleblower must provide any relevant information available to them to assist any inquiry/investigation of the wrongdoing disclosed.

Making a disclosure may not protect the whistleblower from the consequences flowing from involvement in the wrongdoing itself. Even though 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.

Whistleblower Protection Officer

If the whistleblower wishes a Whistleblower Protection Officer may be appointed.

If the disclosure contains allegations against the National Director or a National Leadership Team Member, a report may be made to a Navigators Board Member.

Anonymous Reports

Anonymous reports will be accepted, however, they have significant limitations that may inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation. Specific protection mechanisms may be difficult to enforce if a whistleblower chooses to remain anonymous.

Confidentiality

The Australian Navigators will not disclose a whistleblower's identity unless:

1. It is necessary to further an investigation and the whistleblower consents to the disclosure, and/or
2. The disclosure is required or authorised by law.

In most circumstances, it will be necessary to disclose the facts and substance of a report to a person who may be the subject of the report as it is essential for natural justice to prevail. Although confidentiality is maintained, in some circumstances, the source of the reported issue may be obvious to a person who is the subject of a report.

The Australian Navigators will take reasonable precautions to store any records relating to a report of wrongdoing securely and to restrict access to authorised persons only. Unauthorised disclosure of information that could prejudice confidentiality and identify a whistleblower will be regarded seriously and may result in disciplinary action and where applicable, the Australian Navigators will notify the police.

Approved:



On behalf of the Board of The Australian Navigators

Date: 31/12/2019