



Whistleblowing Policy

Policy

Anglican Overseas Aid (AOA) is committed to the highest standards of conduct and ethical behaviour throughout our organisation. We are committed to promoting a culture of honest and ethical behaviour, compliance with law and good governance that aims to achieve these commitments. People who work with us in any capacity may be the first to realise that there may be something seriously wrong. However, they may not wish to speak up for fear of appearing disloyal or being victimised or subject to retaliation for reporting wrongdoing.

We encourage the reporting of any instances of misconduct, wrongdoing or impropriety, or unsatisfactory circumstances in relation to us, and we provide protections and have processes in place so that those who make disclosures and also those who are the subject of or mentioned in disclosures are supported.

This Policy applies to all activities and services provided by the organisation and applies to all Board members, staff, partners, contractors and volunteers of AOA. The Policy also applies to supporters and prospective supporters visiting AOA programs.

AOA's Assurances / Commitments

We encourage any person who has concerns on reasonable grounds about any AOA People, or AOA as an organisation, to make a disclosure in accordance with this policy.

We are committed to providing transparency about how we receive and handle disclosures subject to requirements under the law.

We are committed to taking appropriate action to address concerns in relation to us, including:

- Ensuring that disclosers can make disclosures safely, securely and with confidence;
- Ensuring that affected persons can respond safely, securely and with confidence to the disclosures; and
- Taking reports of investigations into disclosures of concern seriously, and taking appropriate steps to address findings and any recommendations in such reports.

Disclosable matters

Wrongdoing that can be reported may include, but is not limited to:

- Breaches of the law
- Bribery, corruption or abuse of any position of public trust
- Dishonesty and fraud
- Conduct that endangers health and safety
- Oppressive, negligent or unjust administration
- Gross mismanagement or repeated breaches of agreed procedures
- Anything that involves financial or non-financial loss to the organisation

How to make a disclosure

AOA takes all disclosures seriously, including those from whistleblowers. Disclosures can be made anonymously and/or confidentially, securely and during and outside of business hours.

Note that a prospective discloser may also take their own legal advice.

Important: In accordance with AOA's HR 12 Child Protection and HR 28 PSEAH policies, where the claim concerns alleged physical or sexual abuse of a child or grooming, then in all circumstances this should be reported directly to the Chief Executive Officer, the Chair of the Board or the Safeguarding Focal Point. Overseas reports should be made to the Chief Executive Officer, the Chair of the Board or the Head of International Programs.

When there are concerns a child is in immediate danger, AOA People in Australia should call the local police immediately. For AOA People stationed overseas, they should contact either the Head of International Programs, CEO or Board Chair.

Disclosures may be made via the following avenues:

(a) Phone: (03) 9495 6100 or Toll-free: 1800 249 880

(b) In writing:

- email complaints@anglicanoverseasaid.org.au or chairfrac@anglicanoverseasaid.org.au
- post to PO Box 1339 Fitzroy North VIC 3068
- deliver to Anglican Overseas Aid, c/- The North Collective, 713 Brunswick Street, Fitzroy North VIC 3068

Any disclosure under this policy can be made to the persons listed in the table below:

	If the disclosure relates to a matter or circumstances involving:	The disclosure should be made to the following recipient:
1	The Board	Chief Executive Officer
2	A particular director	Chief Executive Officer <u>or</u> if the director is the Chair of the Finance Risk and Audit Committee, the Board Chair.
3	Chief Executive Officer	Chair of the Finance Risk and Audit Committee <u>or</u> if the Chair of the Finance Risk and Audit Committee is an affected person, the Board Chair.
4	Any other personnel other than the above	Chief Executive Officer

The contact details of the persons listed above are:

Chief Executive Officer	complaints@anglicanoverseasaid.org.au
Chair of the Finance Risk and Audit Committee	chairfrac@anglicanoverseasaid.org.au
Board Chair	chair@anglicanoverseasaid.org.au
Disclosures relating to a disclosable matter can also be made to Australian Securities and Investments Commission (ASIC)	The Australian Securities and Investments Commission (ASIC) prefers to receive whistleblower information via an online form available at asic.gov.au/report-misconduct .

Important: Any person may make a disclosure under this policy but before doing so we encourage a prospective discloser to consider whether the disclosure will be protected under one or more of the relevant laws. Please refer to **Annexure B** of our Whistleblowing Policy: [Whistleblowing Policy with Annexures - website](#)

Procedures after a disclosure is received

The recipient of a disclosure will make a preliminary assessment and appropriate action/s to be taken will be considered. This may involve an informal review, an internal enquiry or a more formal investigation. The recipient of the disclosure will provide the discloser (unless the discloser wishes to remain anonymous) with details of who is handling the matter, how they can be contacted, and whether any further assistance is required from the discloser.

Where an investigation is deemed necessary, the recipient of the disclosure will notify the discloser (unless the discloser wishes to remain anonymous) and any affected person, along with other AOA People as appropriate:

- when the investigator has been appointed;
- the identity of the investigator; and
- when the investigator's report is due.

Following the investigation the recipient of the disclosure will provide the designated decision-maker with the investigator's report and the decision-maker, who will make a formal decision regarding actions (if any) to be taken. The decision-maker will promptly provide the discloser (unless anonymous) and any affected person with a summary of the decision.

Any discloser or affected person who is not satisfied with the decision may request a review, as per the process outlined in Annexure A of our Whistleblowing Policy.

*For further details about our procedures after a disclosure is made, please see **Annexure A** of our Whistleblowing Policy. [Whistleblowing Policy with Annexures - website](#)*

Access to this policy

The AOA Whistleblower Policy will be published or referred to on our website, provided to AOA People, and a copy will be provided to any prospective discloser on request to the Chief Executive Officer. AOA will conduct employee training related to this policy.

For full details please see AOA's Whistleblowing Policy, including Annexure A and Annexure B [here](#).

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