WHISTLE BLOWER POLICY V2.1

Approver	Board of Directors
Owner	CEO
Effective Date	21 May 2026
Next Review Date	21 May 2027

1. Message from the Board

Martin Youth Foundation was established in 1990 with a profound purpose: to support young people experiencing addiction and disadvantage across Australia. For over three decades, we have worked to fulfil Sir David Martin's vision of safety, hope, and opportunity for young people in crisis.

Our success in this mission depends fundamentally on maintaining the highest standards of integrity, transparency, and ethical conduct. Public trust is the foundation upon which charities are built and protecting that trust requires all of us to speak up when something is wrong.

This Whistleblower Policy reflects our commitment to creating a safe environment where concerns about serious wrongdoing can be raised without fear of retaliation. We want everyone connected to the Foundation-our staff, volunteers, contractors, and partners—to feel confident that they can report misconduct and that their disclosures will be handled with the seriousness, confidentiality, and care they deserve.

Speaking up takes courage. We are deeply grateful to anyone who raises concerns in good faith, and we are committed to protecting those who do so. Together, we can ensure that Martin Youth Foundation remains an organisation worthy of the trust placed in us by the young people we serve, our supporters, and the Australian community.

Captain William Martin RAN (Rtd)
Chair, Board of Directors

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2. Introduction

2.1 About This Policy

Sir David Martin Foundation Ltd (ACN 676 472 834) is a company limited by guarantee and a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). The Foundation serves as the Trustee of Martin Youth Foundation (ABN 37 506 673 286), which was established in 1990.

This Whistleblower Policy has been developed to comply with the whistleblower protection regime established under Part 9.4AAA of the *Corporations Act 2001* (Cth) and reflects best practice governance for Australian charities. It forms part of the Foundation's broader commitment to good governance, ethical conduct, and accountability.

2.2 Policy Statement

The Foundation is committed to fostering a culture of integrity, transparency, and accountability. We recognise that individuals who are connected to the Foundation may be the first to observe conduct that is potentially harmful, unethical, or illegal.

We encourage and support the reporting of any instances of suspected wrongdoing. We are committed to ensuring that those who make disclosures can do so safely, securely, and with confidence that they will be protected and supported.

The Foundation will not tolerate any form of retaliation, victimisation, or detrimental treatment against anyone who makes, or is suspected of making, a disclosure under this policy.

2.3 Guiding Principles

This policy is guided by the following principles:

Accessibility: Reporting channels are accessible, clearly communicated, and easy to use.
Confidentiality: The identity of disclosers is protected to the fullest extent possible and permitted by law.
Protection: Disclosers are protected from retaliation, victimisation, and detrimental treatment.
Fairness: Disclosures are handled objectively, and individuals mentioned in disclosures are treated fairly.
Responsiveness: Disclosures are acknowledged, assessed, and investigated in a timely manner.
Accountability: The Board maintains oversight of whistleblower matters and ensures the effectiveness of protections.

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3. Purpose

The purpose of this policy is to:

3.1 Encourage and support the reporting of misconduct, illegal activity, or other serious wrongdoing affecting the Foundation.
3.2 Provide clear guidance on how disclosures can be made, who can receive them, and how they will be handled.
3.3 Ensure that individuals who make disclosures are protected from retaliation, victimisation, or other detrimental treatment.
3.4 Ensure that disclosures are handled confidentially, fairly, and appropriately.
3.5 Ensure the Foundation meets its legal obligations under the *Corporations Act 2001* (Cth) and demonstrates good governance as an ACNC-registered charity.
3.6 Maintain and enhance public trust and confidence in the Foundation's operations and governance.

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4. Scope and Application

4.1 Who This Policy Applies To

This policy applies to disclosures made by Eligible Whistleblowers (as defined in Section 5) concerning the Foundation or any officer or employee of the Foundation.

4.2 Organisational Scope

This policy covers conduct related to Sir David Martin Foundation Ltd and the Martin Youth Foundation Trust.

4.3 Relationship to Other Policies

This policy operates alongside, and should be read in conjunction with, the Foundation's other policies and procedures, including the Code of Conduct, Complaints Handling Policy, and Incident and Breach Management Policy. Section 22 provides further detail on related policies.

This policy is specifically designed for the disclosure of Reportable Conduct (as defined in Section 5). Other types of concerns, such as general workplace grievances, service complaints, or routine operational matters, may be more appropriately addressed through other policies and processes.

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5. Definitions

For the purposes of this policy:

Board means the Board of Directors of Sir David Martin Foundation Ltd.

Chair means the Chair of the Board of Directors.
CEO means the Chief Executive Officer of the Foundation.
Company Secretary means the person appointed as Company Secretary of Sir David Martin Foundation Ltd.
Corporations Act means the *Corporations Act 2001* (Cth).
Detriment includes dismissal, demotion, harassment, intimidation, discrimination, injury, alteration of duties to disadvantage, damage to property or reputation, and any other conduct that constitutes adverse treatment or harm.
Discloser means a person who makes a disclosure of Reportable Conduct under this policy, also referred to as a Whistleblower.
Eligible Recipient means a person authorised to receive disclosures under this policy, as specified in Section 10.
Eligible Whistleblower means a person who is eligible to make a disclosure under this policy, as specified in Section 8.
Foundation means Sir David Martin Foundation Ltd and the Martin Youth Foundation Trust.
Personal Work-Related Grievance means a grievance about any matter in relation to a discloser's employment, or former employment, that has implications for the discloser personally but does not have broader implications for the Foundation or relate to conduct that would constitute Reportable Conduct.
Protected Disclosure means a disclosure that qualifies for protection under the Corporations Act.
Reportable Conduct means the conduct described in Section 7 that may be the subject of a disclosure under this policy.
Whistleblower means an Eligible Whistleblower who makes a disclosure of Reportable Conduct, also referred to as a Discloser.

Whistleblower Protection Officer means the person or persons appointed by the Board to receive and manage disclosures under this policy.

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6. Our Commitment to Whistleblowers

6.1 Foundation Commitment

The Foundation is committed to:

6.1.1 Creating a safe and supportive environment for raising concerns about wrongdoing.
6.1.2 Ensuring that anyone who makes a disclosure in good faith is treated fairly, respectfully, and with dignity.
6.1.3 Protecting the confidentiality of disclosers to the maximum extent possible and permitted by law.
6.1.4 Taking all reasonable steps to protect disclosers from detriment, victimisation, or retaliation.
6.1.5 Ensuring that disclosures are assessed and, where appropriate, investigated in a fair, thorough, and timely manner.
6.1.6 Taking appropriate action in response to findings of misconduct or wrongdoing.
6.1.7 Providing appropriate support to disclosers throughout the disclosure and investigation process.

6.2 No Wrong Door

The Foundation operates a "no wrong door" approach. If a disclosure is made to someone who is not an Eligible Recipient, or if a concern is raised through another channel (such as the complaints process) that constitutes potential Reportable Conduct, the Foundation will ensure it is appropriately referred and managed under this policy.

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7. Reportable Conduct

7.1 What is Reportable Conduct

Reportable Conduct is conduct in connection with the Foundation that a discloser has reasonable grounds to suspect:

7.1.1 Constitutes misconduct or an improper state of affairs or circumstances.
7.1.2 Constitutes an offence against, or a contravention of, a provision of the Corporations Act, the ASIC Act, or any other Commonwealth law punishable by imprisonment for 12 months or more.
7.1.3 Represents a danger to the public or the financial system.
7.1.4 Is prescribed by regulation to be Reportable Conduct.

7.2 Examples of Reportable Conduct

Without limiting the above, Reportable Conduct may include:

Fraud and Financial Misconduct

- Theft, fraud, or misappropriation of funds or assets
- Falsification of financial records or accounts
- Improper use of the Foundation's funds or resources
- Non-compliance with financial reporting requirements

- Breach of fiduciary duties

Corruption and Bribery

- Offering or accepting bribes or kickbacks
- Corrupt conduct involving public officials
- Improper gifts or benefits

Legal and Regulatory Breaches

- Breach of the Corporations Act or ACNC legislation
- Breach of taxation laws
- Breach of fundraising regulations
- Breach of privacy laws
- Money laundering or terrorist financing

Governance Failures

- Failure to disclose conflicts of interest
- Breach of director or officer duties
- Improper related party transactions
- Failure to comply with the Foundation's Constitution

Unethical Conduct

- Dishonest, fraudulent, or corrupt behaviour
- Deliberate breach of the Foundation's policies
- Conduct that damages the Foundation's reputation
- Concealment of any of the above

Serious Risks

- Conduct that poses a serious risk to public health or safety
- Conduct that poses a serious risk to the environment
- Conduct that constitutes a significant risk to the Foundation's operations or viability

7.3 What is Not Reportable Conduct

This policy is not intended to cover:

7.3.1 **Personal Work-Related Grievances**: Grievances about interpersonal conflict, business decisions relating to engagement, transfer, promotion, terms and conditions, suspension, or termination of employment that are personal to the discloser and do not involve broader misconduct.
7.3.2 **Service Complaints**: Complaints about programs or services delivered by partner organisations should be raised through the Complaints Handling Policy.
7.3.3 **Routine Operational Matters**: Concerns about day-to-day operational decisions that do not involve misconduct or wrongdoing.

Important Exception: A Personal Work-Related Grievance may still qualify for protection if:

- It includes information about Reportable Conduct that has broader implications
- It concerns victimisation or detrimental treatment suffered as a result of making, or proposing to make, a disclosure
- It is made to a legal practitioner for the purpose of obtaining legal advice

If you are uncertain whether your concern is Reportable Conduct, you are encouraged to raise it anyway. The Foundation will assess the concern and advise on the appropriate process for addressing it.

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8. Who Can Make a Disclosure

8.1 Eligible Whistleblowers

The following individuals are eligible to make a disclosure under this policy and receive protection under the Corporations Act:

8.1.1 Current and former officers (including Directors) of the Foundation.
8.1.2 Current and former employees of the Foundation.
8.1.3 Current and former volunteers of the Foundation.
8.1.4 Current and former suppliers of goods or services to the Foundation, and their employees.
8.1.5 Current and former contractors, subcontractors, and their employees.
8.1.6 An associate of the Foundation.
8.1.7 A relative, spouse, or dependant of any of the above individuals.
8.1.8 A dependant of a spouse of any of the above individuals.

8.2 Disclosures by Others

Individuals who do not meet the above criteria, but who have concerns about wrongdoing at the Foundation are still encouraged to raise those concerns. While they may not receive the statutory protections of the Corporations Act, the Foundation will treat such disclosures seriously and will not tolerate retaliation against anyone who raises concerns in good faith.

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9. How to Make a Disclosure

9.1 Internal Reporting

Disclosures can be made internally to any Eligible Recipient identified in Section 10. The Foundation encourages disclosers to make internal disclosures in the first instance, as this enables the Foundation to address the concern directly.

Disclosures can be made:

In writing by email to:
whistleblower@martinfoundation.org.au

In writing by post marked "Private and Confidential" to:
Whistleblower Protection Officer
Martin Youth Foundation
GPO Box 69
Sydney NSW 2001

Verbally by requesting a confidential meeting with an Eligible Recipient.

Using the Disclosure Form at Appendix B of this policy.

9.2 Anonymous Disclosures

Disclosers may choose to remain anonymous when making a disclosure, during the investigation, and after the investigation is finalised. Anonymous disclosures will be accepted and investigated.

Disclosers who wish to remain anonymous should:

- Consider how they want to communicate (e.g., anonymous email account, unsigned letter)
- Provide a means of contact if they wish to receive updates (e.g., anonymous email)
- Be aware that remaining anonymous may limit the Foundation's ability to investigate

Anonymous disclosures still qualify for protection under the Corporations Act if the discloser meets the eligibility criteria.

9.3 External Reporting

In some circumstances, disclosers may make disclosures to external parties and still receive protection under the Corporations Act.

Regulatory Bodies

Disclosures can be made to:

- Australian Securities and Investments Commission (ASIC)
- Australian Charities and Not-for-profits Commission (ACNC)
- Australian Prudential Regulation Authority (APRA)
- Australian Federal Police
- Other Commonwealth bodies prescribed by regulation

Legal Practitioners

Disclosures can be made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act.

Public Interest and Emergency Disclosures

In limited circumstances, disclosers may make public disclosures (including to journalists or parliamentarians) and receive protection. Strict conditions apply, and disclosers should seek independent legal advice before making such a disclosure. Generally, a discloser must:

- Have previously made a disclosure to ASIC, APRA, or a prescribed body
- Have reasonable grounds to believe no action is being taken
- Give written notice to the body to which the previous disclosure was made
- For public interest disclosures: wait 90 days and have reasonable grounds to believe disclosure is in the public interest
- For emergency disclosures: have reasonable grounds to believe the information concerns a substantial and imminent danger to health, safety, or the environment

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10. Eligible Recipients

10.1 Designated Recipients

The following persons are authorised to receive disclosures under this policy:

Whistleblower Protection Officer(s)
The Board will appoint one or more Whistleblower Protection Officers. The current Whistleblower Protection Officers are:

Olivia Carney (staff)
whistleblower@martinfoundation.org.au

Anna Beaumont (Director)
Contact via Company Secretary

Chair of the Board
Captain William Martin RAN (Rtd)
Contact via Company Secretary

Company Secretary
Jade Bankier
j.bankier@martinfoundation.org.au

Chief Executive Officer
Karen Elliff
k.elliff@martinfoundation.org.au

Directors
Any Director of the Foundation may receive a disclosure.

Senior Managers
Any senior manager of the Foundation may receive a disclosure.

External Auditor
The Foundation's external auditor, or a member of the audit team, may receive a disclosure.

10.2 Disclosures Involving Senior Officers

Where a disclosure relates to the conduct of a senior officer, the disclosure should be made to a person who is not implicated in the alleged conduct:

- For concerns about the CEO: disclose to the Chair or a Director
- For concerns about a Director: disclose to the Chair or another Director
- For concerns about the Chair: disclose to another Director or the Company Secretary

10.3 Receiving a Disclosure

Any Eligible Recipient who receives a disclosure must:

10.3.1 Treat the disclosure confidentially and securely.
10.3.2 Advise the discloser of the protections available under this policy and the Corporations Act.
10.3.3 Promptly refer the disclosure to the Whistleblower Protection Officer (unless the disclosure concerns that person).
10.3.4 Not disclose the identity of the discloser without their consent, except as permitted by law.

11. Handling of Disclosures

11.1 Initial Assessment

Upon receiving a disclosure, the Whistleblower Protection Officer (or delegate) will:

11.1.1 Acknowledge receipt of the disclosure (where the discloser's contact details are known) within five business days.
11.1.2 Assess whether the disclosure qualifies as a Protected Disclosure under the Corporations Act.
11.1.3 Assess whether the disclosure concerns Reportable Conduct.
11.1.4 Determine the appropriate course of action, which may include investigation, referral to another process, or no further action.
11.1.5 Advise the discloser of the outcome of the assessment and the next steps.

11.2 Confidentiality During Assessment

During the assessment process, all reasonable steps will be taken to protect the discloser's identity and the confidentiality of the information disclosed. Information will only be shared with those who need to know for the purpose of assessing the disclosure.

11.3 Determination of Investigation Approach

Based on the assessment, the Whistleblower Protection Officer will determine:

- Whether an investigation is warranted
- The scope and nature of the investigation
- Who will conduct the investigation (internal or external)
- The timeframe for the investigation
- How the discloser will be kept informed

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12. Investigation Process

12.1 Investigation Principles

All investigations will be conducted:

12.1.1 Fairly, objectively, and without bias.
12.1.2 In accordance with the principles of procedural fairness and natural justice.
12.1.3 Proportionately to the nature and seriousness of the allegations.
12.1.4 In a timely manner, while ensuring thoroughness.
12.1.5 Confidentially, to the extent possible and appropriate.
12.1.6 By persons with appropriate qualifications, experience, and independence.

12.2 Who Will Investigate

Investigations may be conducted by:

- The Whistleblower Protection Officer
- A senior manager not implicated in the disclosure
- The Chair or a Director (for serious matters or matters involving management)
- An external investigator (for complex matters, matters involving senior officers, or where independence is required)

The Board may appoint an independent external investigator where appropriate.

12.3 Investigation Process

The investigation process will typically include:

12.3.1 Developing an investigation plan.
12.3.2 Gathering and reviewing relevant documents and evidence.
12.3.3 Interviewing relevant witnesses.
12.3.4 Providing any person against whom allegations are made an opportunity to respond (subject to confidentiality and legal requirements).
12.3.5 Making findings based on the evidence.
12.3.6 Preparing a written report with findings and recommendations.
12.3.7 Presenting the report to the appropriate decision-maker (which may be the CEO, Board, or a Board committee depending on the nature of the matter).

12.4 Timeframes

The Foundation will endeavour to complete investigations within 90 days of commencing an investigation. Complex investigations may take longer. The discloser will be kept informed of progress and any material delays.

12.5 Keeping the Discloser Informed

Subject to confidentiality, legal, and privacy considerations, disclosers will be kept informed of:

- The receipt and acknowledgement of their disclosure
- The outcome of the initial assessment
- Progress of any investigation
- The outcome of the investigation (in general terms)

If the discloser has remained anonymous, the Foundation will communicate through any anonymous channel provided by the discloser.

12.6 Outcomes and Actions

Following an investigation, outcomes may include:

- Disciplinary action (up to and including termination)
- Referral to law enforcement or regulatory bodies
- Changes to policies, procedures, or systems
- Training or education
- No further action (where allegations are not substantiated)

The Foundation will take appropriate action in response to findings and will report material matters to the Board.

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13. Confidentiality

13.1 Protecting Identity

The Foundation will take all reasonable steps to protect the identity of a discloser. It is an offence under the Corporations Act to disclose the identity of a discloser, or information that is likely to lead to the identification of the discloser, except in limited circumstances.

13.2 When Identity May Be Disclosed

Information that may identify a discloser may only be disclosed:

13.2.1 With the discloser's consent.
13.2.2 To ASIC, APRA, or the Australian Federal Police.
13.2.3 To a legal practitioner for the purpose of obtaining legal advice about the whistleblower provisions.
13.2.4 Where the disclosure is reasonably necessary for the purpose of investigating the matter, and all reasonable steps are taken to reduce the risk of the discloser being identified.

13.3 Practical Measures

The Foundation will implement practical measures to protect confidentiality, including:

13.3.1 Limiting the number of people who are aware of a disclosure and the discloser's identity.
13.3.2 Using secure storage for all documents and information relating to disclosures.
13.3.3 Using code names or anonymisation where appropriate.
13.3.4 Reminding all persons involved of confidentiality requirements.
13.3.5 Not including the discloser's name in written materials where possible.

13.4 Breach of Confidentiality

Any breach of confidentiality by Foundation personnel will be treated as a serious disciplinary matter and may result in disciplinary action up to and including termination. A breach of the confidentiality provisions in the Corporations Act may also attract civil and criminal penalties.

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14. Protection from Detriment

14.1 Prohibition on Detrimental Conduct

It is unlawful under the Corporations Act to cause or threaten detriment to a person because they have made, may have made, propose to make, or could make a disclosure that qualifies for protection.

The Foundation prohibits any form of detrimental conduct against a discloser.

14.2 What is Detriment

Detriment includes, but is not limited to:

14.2.1 Dismissal or termination of employment or engagement.
14.2.2 Demotion, disciplinary action, or reduction of duties.
14.2.3 Alteration of position or duties to the discloser's disadvantage.
14.2.4 Denial of training, promotion, or other employment opportunities.
14.2.5 Harassment, intimidation, or bullying.
14.2.6 Discrimination or adverse treatment.
14.2.7 Threats of any of the above.
14.2.8 Damage to property, reputation, business, or financial position.
14.2.9 Any other conduct that would constitute victimisation or retaliation.

14.3 Consequences of Detrimental Conduct

Any person who engages in detrimental conduct against a discloser:

14.3.1 Will be subject to disciplinary action, up to and including termination of employment or engagement.
14.3.2 May be personally liable for civil penalties under the Corporations Act.
14.3.3 May be liable for compensation to the discloser.
14.3.4 May face criminal prosecution in serious cases.

14.4 Reporting Detrimental Conduct

If a discloser believes they have been subjected to detrimental conduct as a result of making a disclosure, they should immediately report this to:

14.4.1 The Whistleblower Protection Officer.
14.4.2 The Chair of the Board (if the concern involves the Whistleblower Protection Officer).
14.4.3 A regulatory body such as ASIC or ACNC.

The Foundation will investigate any reports of detrimental conduct and take appropriate action.

14.5 Legal Remedies

Disclosers who suffer detriment as a result of making a protected disclosure may seek compensation and other remedies through the courts.

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15. Support for Whistleblowers

15.1 Foundation Support

The Foundation is committed to supporting disclosers throughout the disclosure and investigation process. Support may include:

15.1.1 A nominated contact person to provide updates and assistance.
15.1.2 Flexibility in work arrangements during an investigation (where applicable).
15.1.3 Access to the Foundation's Employee Assistance Program (for employees).
15.1.4 Information about external support services.

15.2 External Support Services

Disclosers are encouraged to access external support services as needed, including:

Lifeline Australia
Phone: 13 11 14
Website: www.lifeline.org.au

Beyond Blue
Phone: 1300 22 4636
Website: www.beyondblue.org.au

Legal Aid
Contact your state or territory Legal Aid office for free legal advice.

15.3 Protections Under the Corporations Act

Disclosers who make protected disclosures are entitled to the following protections under the Corporations Act:

15.3.1 Protection of identity (confidentiality).
15.3.2 Protection from civil, criminal, or administrative liability for making the disclosure.
15.3.3 Protection from any contractual or other remedy being enforced against them for making the disclosure.
15.3.4 Qualified privilege in respect of the disclosure.
15.3.5 Protection from detrimental conduct.
15.3.6 The right to seek compensation and other remedies if they suffer detriment.

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16. Fair Treatment of Individuals Mentioned in Disclosures

16.1 Commitment to Fairness

The Foundation is committed to ensuring that any person who is the subject of allegations in a disclosure is treated fairly. Allegations will be assessed and investigated objectively, and no assumptions of wrongdoing will be made until an investigation has been completed.

16.2 Procedural Fairness

Subject to confidentiality and legal requirements, a person who is the subject of a disclosure will:

16.2.1 Be informed of the substance of any allegations against them.
16.2.2 Be given a reasonable opportunity to respond to the allegations.
16.2.3 Have their response considered before any findings are made.
16.2.4 Be informed of the outcome of the investigation (in general terms).

16.3 Support for Persons Subject to Allegations

Persons who are the subject of allegations may access:

16.3.1 The Foundation's Employee Assistance Program (for employees).
16.3.2 The right to have a support person present during interviews.
16.3.3 External support services as needed.

16.4 Confidentiality

The Foundation will maintain confidentiality regarding the identity of persons who are the subject of disclosures, to the extent possible and appropriate, pending the outcome of any investigation.

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17. Roles and Responsibilities

17.1 Board of Directors

The Board is responsible for:

17.1.1 Approving this policy and any material amendments.
17.1.2 Overseeing the implementation and effectiveness of the policy.
17.1.3 Appointing the Whistleblower Protection Officer(s).
17.1.4 Receiving reports on whistleblower matters (de-identified where appropriate).
17.1.5 Ensuring that the Foundation's culture supports the reporting of wrongdoing.
17.1.6 Ensuring that adequate resources are available to implement this policy.

17.2 Chair of the Board

The Chair is responsible for:

17.2.1 Receiving disclosures, particularly those involving the CEO or senior officers.
17.2.2 Ensuring Board oversight of material whistleblower matters.
17.2.3 Championing a speak-up culture within the Foundation.

17.3 Whistleblower Protection Officer

The Whistleblower Protection Officer is responsible for:

17.3.1 Receiving and assessing disclosures.
17.3.2 Coordinating investigations.
17.3.3 Ensuring disclosers are informed of progress and outcomes.
17.3.4 Implementing protections for disclosers.
17.3.5 Maintaining records and reporting to the Board.
17.3.6 Ensuring the policy is communicated and accessible.

17.4 Chief Executive Officer

The CEO is responsible for:

17.4.1 Implementing this policy within the Foundation.
17.4.2 Promoting a speak-up culture among staff and volunteers.
17.4.3 Ensuring managers are trained to receive and refer disclosures.
17.4.4 Referring disclosures to the Chair where they involve the CEO.

17.5 All Staff, Volunteers, and Contractors

All staff, volunteers, and contractors are responsible for:

17.5.1 Familiarising themselves with this policy.
17.5.2 Raising concerns about wrongdoing through appropriate channels.
17.5.3 Maintaining confidentiality if they become aware of a disclosure.
17.5.4 Cooperating with investigations.
17.5.5 Not engaging in any form of detrimental conduct against disclosers.

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18. Record Keeping and Documentation

18.1 Whistleblower Register

The Foundation will maintain a confidential Whistleblower Register that records:

18.1.1 Details of disclosures received (with discloser identity protected).
18.1.2 Assessment outcomes.
18.1.3 Investigation status and outcomes.
18.1.4 Actions taken.
18.1.5 Reports made to the Board.

18.2 Secure Storage

All documents and records relating to disclosures will be stored securely with access limited to those who need to know. Physical documents will be stored in a locked location. Electronic documents will be stored in a secure, access-controlled system.

18.3 Retention

Records relating to whistleblower disclosures will be retained for a minimum of seven years, or longer if required by law or ongoing legal proceedings.

18.4 Confidentiality of Records

Records will be maintained in a manner that protects the confidentiality of disclosers and other parties, consistent with Section 13 of this policy.

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19. Training and Awareness

19.1 Communication

This policy will be:

19.1.1 Published on the Foundation's website.
19.1.2 Included in the Foundation's policy library.
19.1.3 Referenced in the Employee Handbook.
19.1.4 Provided to all new staff, volunteers, and contractors during induction.
19.1.5 Made available to suppliers and partners.

19.2 Training

19.2.1 All staff and volunteers will receive training on this policy as part of their induction.
19.2.2 Refresher training will be provided at least every two years or when the policy is materially updated.
19.2.3 Eligible Recipients will receive additional training on receiving and handling disclosures.
19.2.4 Training records will be maintained.

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20. Monitoring and Reporting

20.1 Board Reporting

The Whistleblower Protection Officer will report to the Board:

20.1.1 At least annually on the operation and effectiveness of this policy.
20.1.2 Promptly on any material whistleblower matters.
20.1.3 On the number and nature of disclosures received (de-identified).
20.1.4 On the outcomes of investigations and actions taken.
20.1.5 On any themes or systemic issues identified.

20.2 Performance Indicators

The Foundation will monitor the effectiveness of this policy by tracking:

20.2.1 Number of disclosures received.
20.2.2 Time taken to acknowledge and assess disclosures.
20.2.3 Time taken to complete investigations.
20.2.4 Outcomes of investigations.
20.2.5 Reports of detrimental conduct.
20.2.6 Staff awareness and confidence in the policy.

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21. Review and Assurance

21.1 Policy Review

This policy will be reviewed:

21.1.1 At least annually by the CEO and Whistleblower Protection Officer.
21.1.2 Following any material disclosure or investigation.
21.1.3 In response to changes in legislation or regulation.
21.1.4 When directed by the Board.
21.1.5 Following an audit finding or external review.

21.2 Compliance Monitoring

Compliance with this policy will be monitored through:

21.2.1 Regular review of the Whistleblower Register.
21.2.2 Board oversight and reporting.
21.2.3 Internal audits or assurance reviews where appropriate.
21.2.4 Feedback from staff and stakeholders.

21.3 Continuous Improvement

The Foundation is committed to continuous improvement of its whistleblower framework. Lessons learned from disclosures and investigations will be used to strengthen policies, procedures, and systems.
