



R S L N S W

Respecting, supporting and remembering
our veterans and their families

WHISTLEBLOWER POLICY

| | |
|------------------------|-----------------------|
| VERSION | 1.0 |
| DOCUMENT STATUS | Approved |
| DOCUMENT AUTHOR | |
| APPROVED BY | RSL NSW State Council |
| EFFECTIVE DATE | 16 August 2018 |

Table of Contents

| | | |
|-----|---------------------------------|---|
| 1.0 | Introduction..... | 3 |
| 2.0 | Policy Scope..... | 3 |
| 3.0 | Purpose..... | 3 |
| 3.1 | Reporting Concerns..... | 3 |
| 3.2 | Safety and Confidentiality..... | 3 |
| 4.0 | Procedure..... | 4 |
| 5.0 | Contacts..... | 4 |
| 6.0 | References & Resources..... | 4 |
| 7.0 | Document Control..... | 4 |

1.0 Introduction

RSL NSW is committed to maintaining the highest standards of legal, ethical and business practices. Accordingly, RSL NSW fosters a culture where all employees, contractors, volunteers and members of RSL NSW are encouraged to raise concerns about poor or unacceptable business practices, non-compliance with legal, statutory and regulatory obligations and breaches of the RSL NSW Constitution, policies and procedures and are able to do so safely and without penalty.

2.0 Policy Scope

This policy applies to all employees, directors, contractors, consultants, volunteers and members of RSL NSW, its sub-branches and subsidiaries (collectively the RSL Group) who make a disclosure in accordance with this policy (**Whistleblowers**).

3.0 Purpose

The purpose of this policy is to encourage and support Whistleblowers to make responsible disclosures about issues where the interest of others, including the public or the RSL NSW Group itself, is at risk. Such issues might include conduct or behaviour (actual or attempted) that is dishonest, unethical, fraudulent, corrupt, unlawful, in breach of RSL NSW's Constitution or in breach of any relevant legal obligation or legislation (**Reportable Conduct**). This policy does not apply to human resources or workplace relations matters relating to employees and their relationship with RSL NSW or the RSL Group.

3.1 Reporting Concerns

A Whistleblower disclosing Reportable Conduct will not be expected to produce unquestionable evidence to support the case. All that is required is that the person has a genuine doubt, and that the concern is raised reasonably and in good faith. Concerns must be raised in accordance with RSL NSW's Whistleblower Procedure which sets out how RSL NSW will deal with and investigates disclosures of Reportable Conduct.

Disclosures of Reportable Conduct under this policy may be made through the nominated external whistleblowing hotline on the organisation's website.

The Board/State Council may be advised of certain instances of whistleblowing.

3.2 Safety and Confidentiality

RSL NSW recognises that a Whistleblower usually only decides to express a concern after a great deal of thought. Provided the concern is raised in good faith, the Whistleblower will not be at risk of losing their job or volunteer position in the organisation and all reasonable steps will be taken to protect the Whistleblower from suffering any form of reprisal, harassment, discrimination or other disadvantage for coming forward. It does not matter whether the suspicion proves to be unfounded or real.

RSL NSW will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will deal with any such occurrences under the appropriate procedure, that is, **Discrimination, Harassment & Bullying Prevention Procedure** or **Staff Misconduct Procedure**.

If a Whistleblower maliciously raises a matter which they know to be untrue, the protections under this policy will not apply.

RSL NSW recognises that the Whistleblower may not wish to be identified during the course of an investigation. In such circumstances, RSL NSW will do everything possible to protect the Whistleblower's identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing the Whistleblower's identity, the person investigating the Reportable Conduct will discuss with them whether and how to proceed. In a very few cases, it may not be possible ensure complete confidentiality, for example if legal proceedings take place at a later stage, but RSL NSW will do everything possible to support and protect the Whistleblower.

Reports submitted anonymously will be considered, however this may lead to difficulties for the investigating officer looking into the matter and attempts to resolve the concern. Individuals are therefore encouraged to put their name to reports and assist the investigating officer.

4.0 Procedure

Please refer to the Whistleblower Procedure and related procedures listed in Section 6 below.

5.0 Contacts

For any queries regarding this policy, please contact the RSL NSW Company Secretary.

6.0 References & Resources

Internal documents related to this policy

Discrimination, Harassment & Bullying Prevention Procedure

Grievance Procedure

Staff Misconduct Procedure

Whistleblower Procedure

7.0 Document Control

| Number | Version | Position Responsible | Approved By | Scheduled Review |
|--------|---------|----------------------|---------------|------------------|
| X000 | 1.0 | | State Council | Month 20XX |
| | | | | |