

WHISTLEBLOWER POLICY

Purpose

This policy forms the basis of a confidential and clear response to reports of fraud, misconduct and undesirable behaviour within Campbell Page.

This policy assists in:

- Compliance with laws;
- Eradicating unethical behaviour in the workplace;
- A healthier and safer work environment;
- More effective management of fraud, misconduct and undesirable behaviour;
- Improved morale; and
- A clear understanding by employees of their role and responsibilities.

Scope

This policy applies to all eligible Whistleblowers, including Campbell Page employees, contractors, suppliers, volunteers, associates and directors as well as customers, previous employees, members of the public and other external stakeholders. The policy is available to all staff on the Campbell Page intranet. The policy is also available on the Campbell Page website.

Policy Statement

Campbell Page believes that a true commitment to identifying and stopping illegal and other undesirable conduct must include a means of reporting that must be open to all employees and others to report their concerns in confidence and without fear of consequence.

Campbell Page has a Whistleblower Protection and Investigation Officer who is responsible for overseeing this policy, protections of all disclosers, investigations and the Campbell Page Whistleblower program. We also offer an external service (STOPLine) for Whistleblowers to report concerns. The Corporations Act 2001 (Corporations Act) also includes provisions for Whistleblowers to report both internally and to specified external bodies and receive specific protections.

Legal Protections

Under the Corporations Act, there are provisions that allow people to disclose misconduct or improper circumstances. These can be reported internally to an eligible recipient within the organisation or externally to ASIC, APRA or other Commonwealth bodies, or a legal practitioner for the purposes of obtaining legal advice in relation to the matter. Where a Whistleblower is eligible under the Corporations Act (see definition table), the following protections are in place;

- Identity protection (Confidentiality)
- Protection from detrimental acts or omissions
- Compensation and other remedies
- Civil, criminal and administrative liability protections

For more information, see the Corporations Act section on page 4

What to Report

Whistleblowers are encouraged to report any conduct that they believe breaks our policies, government agreements, Code of Conduct or standards of behaviour. As well as those covered under the Corporations Act, Campbell Page encourages people to report the following, although protections under the Corporations Act may not apply;

- Fraudulent or corrupt conduct;
- Dishonest conduct;
- Unlawful (including theft, drug sale or use, violence, bullying, harassment etc.) conduct;
- Unethical conduct;
- Misleading or deceptive conduct; or
- Misconduct.

Refer to the Fraud and Corruption Policy and Code of Conduct for further information.

Behaviour and/or conduct that is not covered by this policy includes staff grievances. These matters should be reported to your manager or a member of the People and Culture team.

Whistleblowers must act in good faith and have reasonable grounds for believing the conduct or behaviour is inappropriate. Reports are investigated where enough information is provided by the Whistleblower to identify the individual/s involved or circumstances reported. Without this level of information, an investigation cannot be conducted.

The Whistleblower program and this policy aims to encourage reporting of genuine misconduct and is not to be used to resolve personal grievances or conflict. Where false reports are made by employees, disciplinary action may be taken.

Confidentiality

The confidentiality of information collected as part of a Whistleblower report is maintained at all times. Information is stored securely with the Risk and Audit team to ensure privacy and legal privilege is kept.

The identity of a Whistleblower is kept confidential. This information is only shared with staff who need it as part of the investigation. Where the identity of a Whistleblower is not required as part of the Investigation or follow-up actions, this is not shared.

After a Whistleblower investigation is completed, the results are only communicated to those who need to know the outcome. Where staff are notified about a Whistleblower, it is their responsibility to keep this information confidential. Unauthorised sharing of information by Campbell Page staff may be the subject of disciplinary action.

Where a Whistleblower is concerned about their confidentiality, they are able to make a complaint internally to the Whistleblower Protection and Investigation Officer (Senior Manager Risk and Audit) or externally to ASIC, APRA or the ATO. It is illegal for a person to identify a Whistleblower or disclose information that is likely to lead to the identification of the Whistleblower (some exceptions apply). Where a Whistleblower has a complaint about how their confidentiality has been maintained, this is taken very seriously within Campbell Page and any complaint will be investigated and responded to.

STOPLine offers Whistleblowers three options regarding their confidentiality when making a report;

- Remain completely anonymous, not providing any contact or identifiable information to the service;
- Maintain anonymity with Campbell Page, providing contact details to STOPLine that will not be passed onto Campbell Page but will be used to provide updates or collect additional information; or
- Provide contact details to STOPLine and grant permission for these to be passed on to Campbell Page.

How to Report

A Whistleblower can report matters via email or phone to the following internal staff members:

- Whistleblower Protection and Investigation Officer (Senior Manager Risk and Audit being Lorna Willis);
- A member of the Campbell Page Executive Leadership Team; or
- A member of the Campbell Page Board.

Campbell Page has an external confidential service available to people who don't feel comfortable reporting internally or want to remain anonymous. STOPLine, an Australian independent provider is used to manage Campbell Page's external service. Matters can be reported to STOPLine 24 hours a day through several ways;

1. Telephone (1300 304 550)
2. Mail (The STOPLine, PO Box 403, Diamond Creek, Victoria)
3. Email (campbellpage@stopline.com.au)
4. Fax (Attention Case Manager +613 9882 4480)
5. Online (<https://campbellpage.stoplinereport.com/>)
6. STOPLine App (download 'stop247' from Google Play or iTunes App Store)

STOPLine is available to all Campbell Page employees, contractors, volunteers and directors as well as previous employees, members of the public and other external stakeholders. Translation services are available if needed. The link to the STOPLine website can be found on both the intranet and Campbell Page's external website.

People who are worried about their anonymity are encouraged to only report through STOPLine or use a pseudonym. STOPLine is independent of Campbell Page and has greater control over the anonymity of disclosers.

To report a matter under the Corporations Act, a Whistleblower can choose to report this to Campbell Page under any of the ways listed above or externally. For information on external reporting covered by the Corporations Act, see 'Corporations Act' section of this policy below.

Receiving Whistleblower reports

Whistleblower reports received internally are:

1. Reported to Whistleblower Protection and Investigation Officer from whomever received the report;
2. Reviewed by Risk and Audit and/or Head of People and Culture to determine Whistleblower protection, level of investigation required and conduct a disclosure assessment;
3. Lead investigator assigned based on the report contents; and
4. Prioritised by investigator to ensure allegations are investigated and resolved as soon as possible.

Whistleblower reports received via STOPLine are:

1. Provided to Whistleblower Protection and Investigation Officer within 24hrs of the report being made to them;
2. Reviewed by Risk and Audit and/or Head of People and Culture to determine Whistleblower protection, level of investigation required and conduct a disclosure assessment;
3. Lead investigator assigned based on the report contents; and
4. Prioritised by investigator to ensure allegations are investigated and resolved as soon as possible.

Reviews of reports are conducted to determine:

- The nature and scope of the investigation;
- The persons within and/or outside the organisation that should lead the investigation;
- Identification of parties who need to be excluded from the investigation and notification process in order to maintain transparency and confidentiality;
- The nature of any technical, financial or legal advice that may be required to support the investigation; and
- The timeframe for the investigation;

Investigating reports

The purpose of investigating reports is to determine if there is enough evidence to substantiate or refute the allegations.

All Whistleblower reports are confidentially investigated by the Risk and Audit team. Any Whistleblower report that qualifies under the Corporations Act will be investigated by the Risk and Audit team with the possibility of assistance from third party investigators.

Investigations are completed objectively, fairly and independently and may involve internal or external specialists. Where reports include allegations of bullying, harassment and/or violence, advice from People and Culture may be sought. Contract Assurance may be utilised to support investigations relating to Employment Service Deed breaches.

An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure prior to any actions being taken. There may be circumstances where an employee is not informed of the disclosure if it will impact the confidentiality of the Whistleblower and the investigation has identified the report is unsubstantiated.

The subject of an allegation is given the chance to respond subject to a report being substantiated. A discloser may choose to remain anonymous while making the disclosure, over the course of the investigation and after the investigation is finalised. A discloser may refuse to answer questions that they feel could reveal their identity at any time. Someone who wishes to remain anonymous should maintain ongoing two-way communications with Campbell Page, so they can ask follow-up questions or provide feedback.

No Campbell Page employee or director will receive updates on an investigation in progress where they are the subject of the report.

STOPLine is provided with updates on the progress of the investigation by the Risk and Audit team. Where the Whistleblower has provided their contact information, they are kept up to date with the investigation and informed of the outcome.

There may be circumstances where Campbell Page is unable to provide details of the outcome to the discloser. Campbell Page reduces the risk of discloser being identified from information in their report by limiting access to the discloser and investigation to only those required.

Where a discloser or other party (e.g. discloser's support person, others involved in the investigation) does not agree with the findings of the investigation, this can be highlighted to the Whistleblower Protection and Investigation Officer or an Eligible Recipient to organise a review of the investigation.

Reporting on Investigations

Findings from any investigation will be documented in a report format. These findings are then reported to the CEO as soon as possible and Board at the next board meeting. Based on the findings, the decision may be made to notify board members earlier, notify funding bodies or law enforcement as well. For more information on the process of investigations, see the Whistleblower Investigation Procedure.

Timeframes

Where achievable, Campbell Page will work within the following timeframes for receiving, responding, investigating and reporting Whistleblower allegations.

Timeframe	Action
24hrs of report being received (where contact details are provided)	Receiving disclosure and responding to report
24hrs from each message	Responding to subsequent messages from the discloser
48hrs from report being received	Receiving disclosure and assessing the report for investigation
2 weeks from decision to investigate	Commencing and finalising investigation
Weekly or based on discloser preferences	Updates to the discloser

Corporations Act

Protections are available to people where specific information is disclosed either to specific external organisations (ASIC, APRA and Commonwealth Authority), an eligible recipient or in public interest or emergency disclosures. Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act.

Protections available under the Corporations Act when reports are made to those listed above include;

Protection	Details
Identity of protection (confidentiality)	Reducing the risk that the discloser will be identified from the information contained in the disclosure. Secure record-keeping and information sharing processes
Protection from detrimental acts or omissions	Assessing the risk of detriment against a discloser and taking actions to protect the discloser Offering support services to a discloser and strategies to help minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation Management are made aware of their responsibilities to do the above Detailing how a complaint about detriment can be lodged and the actions that may be taking in response Interventions for protection if detriment has already occurred
Compensation and other remedies	A discloser can seek compensation or other remedies through the courts if a) they suffer loss, damage or injury because of a disclosure; and b) the entity failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.
Civil, criminal and administrative liability protections	Disclosers are protected from any of the following in relation to their disclosure a) Civil liability (e.g. any legal action for breach of an employment contract, duty of confidentiality or another contractual obligation) b) Criminal liability (e.g. attempted prosecution for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than making a false disclosure) c) Administrative liability (e.g. disciplinary action for making the disclosure) Note – protections do not grant immunity for any misconduct a discloser has engaged in that is relevant to their disclosure

What to report under Corporations Act

The Corporations Act states that protections are available to those who report any of the following to those listed above as able to receive reports.

Misconduct, or improper state of affairs or circumstances relating to Campbell Page, an officer or an employee of Campbell Page that is an offence against

- State or federal law
- The Corporations Act
- The ASIC Act 2001
- Banking Act 1959
- Financial Sector (Collection of data Act) 2001
- Insurance Act 1973
- Life Insurance Act 1995
- National Consumer Credit Protection Act 2009
- Superannuation Industry (Supervision) Act 1993
- Any instrument made under any of the above acts
- An offence of commonwealth law that is punishable by imprisonment for a period of 12 months or more or represents a danger to the public or the financial system
- Is prescribed by regulation

How to Report

To be eligible for protections under the Corporations Act, a Whistleblower may use any of the reporting options under the 'How to Report' section of this policy (page 2). Disclosers eligible under the Corporations Act are also able to report externally to Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by regulation.

Below are information sheets to assist in reporting outside of Campbell Page

[Information Sheet 239 How ASIC handles Whistleblower reports](#)

[Become a Whistleblower](#)

Public Interest and Emergency Disclosures

A discloser may make a Public Interest Disclosure to a journalist or a parliamentarian where they have previously made a disclosure to an external body (i.e. ASIC, APRA or another Commonwealth body) and don't believe sufficient action is being taken. Section 1317AAD of the Corporations Act provides more information about how to make a public interest disclosure.

Emergency disclosures are also available to disclosers to journalists or parliamentarians where they have disclosed to an external body (ASIC, APRA or another Commonwealth body) and they have reasonable grounds to believe that the information concerns imminent danger to the health and safety of one or more persons or to the natural environment.

In order to make an Emergency Disclosure or a Public Interest Disclosure, the disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. At least 90 days must have passed since the previous disclosure was made as well.

It is recommended that anyone considering making an Emergency Disclosure or a Public Interest Disclosure first contact an independent legal adviser as well as fully understand the criteria for making a public interest or emergency disclosure.

Rights and Protection of Whistleblower

Whistleblowers are protected, they cannot be punished or personally disadvantaged because of a report they have made based on actions they believe have occurred. Where an investigation deems that a disclosure is incorrect, the discloser can still qualify for protections under certain circumstances. Where a mischievous or misleading report is made, disciplinary action may be taken.

A person who believes they or their family are being discriminated against due to making a report should notify the Chief Executive Officer straight away. A Campbell Page employee or director that has dismissed, demoted or harassed a Whistleblower due to making a report will face disciplinary action. Where a misleading report is made, People and Culture may be required to investigate and recommend appropriate actions.

Whistleblowers are not protected from the consequences of their own improper conduct. If they have participated in inappropriate behaviour, they must deal with the consequences.

It is encouraged that Corporations Act eligible Whistleblowers seek independent legal advice regarding consequences and compensation.

It is encouraged that all employees access the Employee Assistance Program (EAP) when involved in a Whistleblower report and investigation. EAP can be contacted via phone (1300 687 327), online (www.convergeinternational.com.au) or their App (EAP Connect).

Where detriment has occurred, Campbell Page will work with the Whistleblower to support and assist in getting compensation. Where a Whistleblower qualifies as a Whistleblower under the Corporations Act, they can seek compensation through the courts if they suffer loss, damage or injury because of a disclosure and Campbell Page fails to take reasonable precautions to prevent this.

Responsibilities

Compliance, monitoring and review

This policy is reviewed in line with changes to legislation and by Risk and Audit on an annual basis as part of the Audit and Risk Committee (ARC) governance calendar.

Reporting

The Chief Executive Officer and Chief Financial Officer are notified of Whistleblower reports by the Risk and Audit Team. The Head of People and Culture is also informed.

A summary of the allegation and the results of the investigation are reported to the Audit and Risk committee in a timely manner.

STOPLine provide quarterly status updates to Risk and Audit to assist in keeping their records up to date.

Communication

The CEO is the only person authorised to issue communication on behalf of Campbell Page about a Whistleblower report. See Media Policy for more detail.

This policy is made available to staff and member of the public through the external Campbell Page website and internal intranet system. A Campbell Page Whistleblower poster is also available in all offices.

Depending on the nature, reports will be made to funding providers as per funder agreements.

Records Management

STOPLine maintains records of all reports made through them.

The Risk and Audit team maintains Whistleblower documentation in a limited access drive on the Campbell Page secure network.

Definitions

Definitions and Acronyms	
Whistleblower	A person who informs on a person or organisation about any wrongdoing unlawful or unethical activity, which includes any form of fraud or corruption.
Eligible Whistleblower under Corporations Act	An individual to whom the Corporations Act Whistleblower protections apply including, an individual who is or has been; <ul style="list-style-type: none"> • An officer or employee (e.g. current or former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers and directors); • A supplier or services or goods to the entity (whether paid or unpaid), including their employees (e.g. current and former contractors, consultants, service providers and business partners); • An associate or the entity; and • A relative, dependant or spouse or current or former employees, contractors, consultants, service providers, supplies and business partners.
Misconduct	Fraud, negligence, default, breach of trust and breach or duty
EAP	Employee Assistance Program

Whistleblower Program	Campbell Page program for managing and responding the Whistleblower reports including the use of an externally hosted Whistleblower Hotline, Campbell Page Whistleblower Policy, Risk and Audit ownership of investigations and detailed investigation and reporting processes
Whistleblower Protection and Investigation Officer	Senior Manager Risk and Audit being Lorna Willis or delegate
Eligible Recipient	An officer or Senior Manager, an auditor or a member of the audit team conduction an audit, an actuary, a person authorised by Campbell Page to receive disclosures under the Corporations Act. Authorised persons within Campbell Page are; Board of Directors, all members of the Leadership Team and Senior Manager Risk and Audit.

Related legislation and documents

Supporting Information	
Legislative Compliance	This Policy supports Campbell Page’s compliance with the following legislation: <ul style="list-style-type: none"> • Corporations Act 2001 • Whistleblowers Protection Act 1993 (SA) • Whistleblowers Protection Act 1994 (QLD) • Public Interest Disclosures Act 1994 (NSW) • Public Interest Disclosure Act 2013 (Comm) • Protected Disclosure Act 2012 (Vic)
Supporting Documents	Regulatory Guide 270: Whistleblower Policies
Related Documents	<ul style="list-style-type: none"> • Code of Conduct Policy • Fraud and Corruption Policy • Internal Audit Policy • Fraud and Misconduct Investigation Process Map • Media Policy • Resolving Workplace Conflict Policy
Superseded Documents	Nil

Feedback

Campbell Page staff may provide feedback about this policy by emailing policy@campbellpage.org.au or contacting the Policy Sponsor.

Approval and Review Details

Revision History				
Version	Policy Sponsor	Approval Team	Approval/Effective Date	Next Review
13.0	Senior Manager Risk and Audit	Campbell Page Board	February 2022	February 2024
Sections Modified	V13.0 Minor amendment to content, update to Stopline online reporting link. V12.0 Minor amendments to content to align wording with Regulatory Guide 270: Whistleblower Policies V11.0 Inclusion of information regarding identification of parties who need to be excluded from the investigation and notification process in order to maintain transparency and confidentiality V10.0 Minor grammatical updates, updates to STOPLine postal address			

Disclosure Risk Assessment

A risk assessment is conducted on all disclosures received by Campbell Page to determine the notification and key initial steps to be taken. This assists in providing a uniform approach to all disclosures. All disclosures that are eligible for protection under the Corporations Act are treated as either High or Medium depending on the detail of the report.

Rating	Details	Notifications
High	<p>Must meet all four criteria</p> <ol style="list-style-type: none"> 1. Discloser is confidential or asked to be anonymous and, 2. Report details will impact discloser confidentiality (small site, small team, specific details of report and, 3. Report includes possible breaches of law and or funding contract and, 4. One of the following <ol style="list-style-type: none"> a. Details of the report is not clear or enough to initial determine who is involved (including which staff and if senior leaders are involved) or, b. Report details involved staff and/or members of the public being in danger. 	<p>Board and CEO notified a Whistleblower Report received, risk assessment level (High) and next steps.</p> <p>Legal Counsel advice sort.</p> <p>Emergency Services notified.</p> <p>Relevant other third-party organisations notified.</p>
Medium	<p>Must meet all four criteria</p> <ol style="list-style-type: none"> 1. Discloser asked to remain anonymous or is confidential and, 2. Report details will impact disclosure confidentiality (small site, small team, specific details of report) and, 3. Details of report include breaches of law and or funding contract and, 4. One of the following <ol style="list-style-type: none"> a. Details of report not clear enough to determine senior leaders are involved or, b. Report details do not include staff and/or members of the public being in danger. 	<p>High level detail of report provided to Board, CEO, CFO, and COO including risk assessment level (Medium) within 24hrs.</p> <p>Once initial investigation completed, and other involvement identified, Program Manager notified of report. No detail provided until investigation completed.</p>
Low	<p>Must meet all three criteria</p> <ol style="list-style-type: none"> 1. Person has asked to remain anonymous, hasn't provided details or report could involve Program Manager and, 2. Report could include breaches of law, funding contract, forcing people to do things and/or puts staff and or members of the public in danger and, 3. Details of the allegation enough to determine if Program Manager involved. 	<p>Board, CEO, CFO, relevant Leadership Team member and Head of People and Culture provided detail of report including risk assessment level (Low) within 24hrs.</p> <p>Program Manager notified Whistleblower Report received after implication confirmed as no.</p>
Insignificant	<p>Must meet all three criteria</p> <ol style="list-style-type: none"> 1. Person has provided details or doesn't want to remain confidential and, 2. Report does not include breaches of law, funding contract, forcing people to do things and/or doesn't put staff and or members of the public in danger and, 3. Member of notification team not implicated or possibly implicated in allegation. 	<p>Board, CEO, CFO, relevant Leadership Team member, Head of People and Culture and Program Manager provided details of allegation within 24hrs.</p>