

Interplast Australia & New Zealand

Whistleblowing Policy

Policy Status:
Approved

Initial CEO Endorsement:	20 August 2018
Board Approval Date:	10 October 2023
Last Review Date:	28 September 2023
Future Review Date:	01 October 2025
Frequency of Review:	2 years
Policy Owner:	Head of Corporate Services

Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Initially approved	20 August 2018	21 August 2018
<p>Inclusion of PSEAH Policy reference.</p> <p>Updates to the Scope of the Policy and legislative framework in line with the Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2019 which came into effect 1 July 2019.</p>	30 July 2019	6 August 2019
<p>Updated to reflect new template and new definitions. Separated policy and procedure. Complete review. Whistleblower to Whistleblowing Policy.</p>	28 September 2023	10 October 2023

Table of Contents

Revisions to Policy	2
Section 1: Purpose	4
Section 2: Scope.....	4
Section 3: Policy Statement	4
Section 4: Policy	5
4.1: Raising a whistleblowing concern	5
4.2: Confidentiality	6
4.3: Protection for whistleblowers	6
4.4: Fair treatment of persons who are the subject of a whistleblowing report	6
4.5: Investigating whistleblowing concerns	7
Section 5: Monitoring and Review of this Policy	8
Section 6: Related Documents and Legislation.....	8
Section 7: Definitions.....	9

Section 1: Purpose

The purpose of the Whistleblowing Policy is to outline Interplast Australia & New Zealand's (Interplast's) commitment to fostering a supportive, ethical, transparent and accountable working environment where any misconduct within or by Interplast can be raised without fear of retribution.

This policy provides Interplast personnel and observers with clear information and reassurance about their rights, responsibilities and protections with regards to reporting and investigating, or suspected wrongdoing within Interplast.

Section 2: Scope

The Whistleblowing Policy applies to all Interplast personnel and observers of any Interplast activity, former and current, and their spouses and relatives.

This policy refers only to the raising of genuine whistleblowing concerns (defined below).

This policy does not cover the raising of a complaint (defined below). Complaints handling is addressed in Interplast's Complaints Policy.

Personal work-related issues and grievances that an employee or volunteer has, will be managed in accordance with Interplast's Grievance Resolution Policy.

Section 3: Policy Statement

Interplast is committed to fostering the highest standards of legal, ethical and moral behaviour within our organisation. This includes ensuring that all personnel operate from sound ethical principles; and are aware of and follow our organisational policies and procedures that support principles of integrity, transparency, accountability, and fair dealings.

All organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. Interplast recognises that people who have a working relationship with Interplast are often the first to realise there may be concerns, and in order to guard against such risks, Interplast is committed to ensuring our personnel feel supported to raise concerns without fear of disadvantage or retribution; and confident any concerns or wrongdoing that is raised will be investigated properly and where appropriate acted on.

This is achieved by:

- Encouraging the reporting of serious misconduct
- Providing protected misconduct reporting alternatives to remove any concerns that may stop such disclosures
- Establishing procedures that enable:
 - protection for those that make serious misconduct disclosures

- independent internal inquiry/investigation of disclosures made
- resolution of the issue(s) identified.

When a person makes such a disclosure, they are entitled to expect that:

- Their identity always remains confidential to the extent permitted by law or is practical in the circumstances. Penalties may be imposed if a whistleblower's identity is revealed
- They will be protected from reprisal, harassment or victimisation for making the report and may be compensated if they receive detriment
- Should retaliation occur for having made the disclosure, Interplast will treat it as serious wrongdoing under this Policy.

The Whistleblowing Policy is closely associated with a number of other policies and should be read in conjunction with Interplast's:

- Grievance Resolution Policy
- Anti-Fraud and Anti-Corruption Policy
- Child Protection Policy
- Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.

All Interplast personnel, observers, local partners and other program activity participants will be made aware of this policy and their responsibilities to report wrongdoing that they are aware of. It is also referenced in the Program Participant Protocol and included agreement, which is signed by all volunteers and observers that attend an Interplast program activity.

Section 4: Policy

4.1: Raising a whistleblowing concern

All Interplast stakeholders will have access to this Policy via the Interplast website.

All personnel, observers and partners of Interplast who are aware of possible wrongdoing, have a responsibility to disclose that information.

Whistleblowers are encouraged to report whistleblowing concerns to their line manager, Safeguarding focal point or the Chief Executive Officer (CEO).

Where a concern relates to suspected wrongdoing by the CEO, whistleblowers may raise their concern directly to President of the Interplast Board. The Interplast office can be contacted on 03 7042 5460, and a phone number will be provided.

Reports must be as thorough as is possible and can be made in person, by telephone or in writing.

Written reports may be emailed to: admin@interplast.org.au, which is received by the CEO only.

Although Interplast encourages whistleblowers to seek advice from the CEO before making an external report, whistleblowers may choose to report whistleblowing concerns to an external body where the individual believes this is the appropriate course of action.

Depending on the nature of the concern, external bodies may include:

- The [Australian Charities and Not-for-profit Commission](#) (ACNC)
- The [Australian Council for International Development](#) (ACFID)
- Legal authorities responsible for the enforcement of the law in the relevant area.

4.2: Confidentiality

Whistleblowers should feel comfortable reporting a whistleblowing concern under this policy. Reports will be treated with confidentiality by all parties involved, subject to any disclosures required as part of any regulatory process or legal proceedings.

Although not prevented from doing so, whistleblowers are encouraged not to make anonymous disclosures, as proper investigation is likely to be facilitated through the opportunity to clarify or obtain further information from the whistleblower.

Whistleblowers concerned about possible retaliation or reprisals if their identity is revealed should make this clear when making the report so that appropriate measures can be taken to protect their identity as far as possible.

4.3: Protection for whistleblowers

Interplast is committed to protecting whistleblowers who make disclosures under this policy.

Any member of personnel of Interplast who retaliates against a whistleblower or in any way causes a whistleblower to suffer adverse employment consequences as a result of their report, is subject to discipline, up to and including termination of employment. Retaliation and adverse employment consequences may include, for example, intimidation, bullying, harassment and discrimination, failure to promote, adverse impact on compensation or benefits, termination, suspension, demotion, or other change in responsibilities whether formal or informal.

Whistleblowers who believe they have suffered retaliation or adverse employment consequences as a result of having reported a whistleblowing concern should inform the CEO and/or President of the Board.

4.4: Fair treatment of persons who are the subject of a whistleblowing report

Interplast will take reasonable steps to treat person/s who are the subject of a report fairly, particularly during the assessment and investigation process. This includes ensuring that the person/s are:

- Informed about the nature of the report and any adverse comments that may arise further during an investigation
- Given the opportunity to answer allegations before a final decision is made

- Able to have their defence set out fairly in any report
- Informed, where possible, of the final outcome of the investigation.

Where an investigation does not substantiate the report, the investigation, results of the investigation and the identity of the person who is the subject of the report will be handled confidentially. Interplast will give its full support to a person/s who are the subject of a report where the allegations are clearly wrong or unsubstantiated.

False or malicious allegations will be subject to investigation and if substantiated result in disciplinary action.

4.5: Investigating whistleblowing concerns

Interplast will take all whistleblower reports seriously, and will investigate whistleblower concerns quickly and efficiently, with results handed down in a timely manner.

Upon receipt of a whistleblowing report, the recipient, if not the CEO, must notify the CEO as soon as practical. If the report relates to suspected wrongdoing by the CEO, the President of the Interplast Board should be notified instead.

Investigation of whistleblowing reports will be led by the CEO except where the report relates to suspected wrongdoing by the CEO and/or where there may be a conflict of interest. In this instance, investigation will be led by the President of the Board.

Depending on the nature of the report, the CEO, President of the Board or delegated Board Director, will involve senior Interplast personnel to support the investigation as per table one below.

The process of investigation will be guided by relevant Interplast policies as per table one below.

Nature of whistleblowing report	Interplast personnel likely to be involved in the investigation (in addition to the CEO or Chair ARC)	Relevant Interplast Policy
Safeguarding children	Child protection focal point	Child Protection Policy
Sexual harassment, exploitation, abuse or misconduct or any other form of harassment, bullying or discrimination	PSEAH focal point (sexual exploitation, abuse and harassment only)	Equal Employment Opportunity and Anti-Discrimination Policy Prevention of Sexual Exploitation and Abuse Policy
Fraud, corruption or any other financial irregularity	Head of Finance	Anti-fraud and Anti-corruption Policy

Any other issue	Advice will be sought internally or externally as required.
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For further information on investigating whistleblowing concerns, please refer to the Whistleblowing Procedures.

Section 5: Monitoring and Review of this Policy

This policy will be monitored and reviewed at intervals as indicated in this policy and following the process outlined in Interplast’s Policy Framework.

The Chief Executive Officer is ultimately accountable to the Board for managing and maintaining this policy and is responsible for the implementation of this policy. The Board is responsible for adopting this policy.

The Head of Corporate Services is accountable to the Chief Executive Officer for ensuring the currency of this policy and all supporting procedures and relevant manuals and has responsibility for operationalising the policy.

Where compliance issues are identified, they will be addressed promptly. The Chief Executive Officer is responsible for taking any recommended amendments to this policy to the Interplast Board for its approval.

Section 6: Related Documents and Legislation

As a signatory to the ACFID Code of Conduct, Interplast is committed to protecting the human rights and safety of its employees and volunteers by enabling them to report wrongdoing through fair, transparent and accessible procedures (Quality Principle 9 People and Culture; Commitment 9.2.2).

As a DFAT-accredited NGO, Interplast is also required to comply with DFAT standards relating to protection of whistle-blowers, specifically, DFAT Accreditation Criteria A2.4: ANGO has established public-facing complaints handling, whistleblowing and incident management systems that are accessible to all stakeholders.

Name of document/legislation	Location/hyperlink
Anti-fraud and Anti-corruption Policy	Interplast Key Documents
Complaints Policy	
Equal Employment Opportunity and Anti-discrimination Policy	
Child Protection Policy	

Prevention of Sexual Exploitation, Abuse and Harassment Policy	
Grievance Resolution Policy	
Employee Conflict of Interest Policy	
ACFID Code of Conduct	https://acfid.asn.au/code-of-conduct/
G20 Commitment to Whistleblowing (2010 Seoul Summit)	www.oecd.org/corruption/48972967.pdf
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019	https://www.legislation.gov.au/ Link to legislation
Corporations Act 2001	

Section 7: Definitions

Word / Phrase	Definition
Personnel	<p>Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast.</p> <p>Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.</p>
Observer	<p>Observers are individuals accompanying an Interplast program, delivered by volunteers in a partner country (e.g. representing a donor organisation or students on an observational placement). Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.</p>
Partner	<p>Partner includes organisations that work with Interplast to implement a joint project with mutually agreed outcomes, and/or with whom Interplast has a signed partnership agreement and/or memorandum of understanding.</p> <p>Partner organisations may or may not be recipients of funds through Interplast.</p>

Beneficiary	Beneficiary 1) a patient receiving treatment through an Interplast activity (this may include a consult only, surgery, allied health treatment or other clinical care, and could be provided by an Interplast volunteer, or a local partner clinician during an Interplast activity), or 2) local partner personnel participating in training delivered by Interplast.
Stakeholder	Stakeholders include all personnel, observers, partners, beneficiaries and supporters, community members in the country where we work, funders, international development peers and organisations, or any other individuals or organisations that connect with Interplast.
Whistleblowing	Disclosure of information which exposes actual or suspected illegal, unethical, fraudulent, corrupt, irregular and/or unsafe practices and/or other wrongdoing.
Whistleblower	Any person who raises a genuine concern either internally or externally regarding any suspected illegal, unethical, fraudulent, corrupt, irregular and/or unsafe practices and/or other wrongdoing within Interplast.
Complaint	Any significant expression of dissatisfaction or grievance made by any person against Interplast or one or more Interplast personnel in relation to the work of Interplast.