



Whistleblower Policy

1. Introduction

First Hike Project Inc. (FHP) values transparency and accountability. FHP is also committed to operate legally (in accordance with applicable legislation and regulation), properly (in accordance with organisational values, policies, procedures and applicable codes), and ethically (in line with recognised ethical practice).

2. Purpose

This Whistleblower Policy (**Policy**) establishes a framework to provide all board members, staff, volunteers, contractors, visitors, donors, sponsors, partners and members of the public an accessible and safe process to report concerns about a wrongful act or misconduct by someone involved with FHP.

3. Scope

This Policy applies to all board members, staff, volunteers, contractors, visitors, donors and sponsors (**Personnel**) involved with FHP supported work.

4. Policy

4.1 Principles underpinning this Policy

All Personnel:

- have an obligation to report wrongful acts in accordance with this Policy
- have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal

All members of the public:

- are encouraged to report wrongful acts involving FHP Personnel involved with FHP supported work

When a whistleblower makes a report of misconduct, FHP will:

- respond in a timely, respectful and confidential manner to all disclosure of wrongful acts
- adhere to the protection offered under any legislative whistleblowers' protection acts
- refer the matter to law enforcement agencies where it has been assessed that the matter may be subject to a criminal investigation
- take all reasonable steps to preserve confidentiality of reporters and their information
- respond to reports with impartiality

This Policy is not intended to replace the procedures in FHP's Complaint and Complaints Handling Policy which exists for Personnel to raise any matter they may have in relation to their work or their work environment or other person.

4.2 Protection as a whistleblower

FHP will make every effort to protect those who make a whistleblowing disclosure in good faith and on reasonable grounds from reprisal, discrimination, harassment or victimisation.

4.3 Process for making a disclosure

Reports can be made in writing or verbally and should include as much detail as possible and, where feasible, supporting evidence. It is acceptable to make an anonymous complaint; however, it is noted that this may impede any subsequent investigation.

Whistleblowing reports should be made to any of the following:

- FHP Personnel: when Personnel receives a report, they will immediately inform the Director unless the report is in relation to the Director, in which case they will immediately inform the Board Chair.
- The Chair of the Board: when the Board Chair receives a report, they will inform the Director, unless the report is in relation to the Director.

If necessary, all reports can be made via email to neil@firsthikeproject.com.au (this is directed to FHP's Director).

Upon receiving a report, FHP will appropriately and discretely investigate concerns and, where possible, will provide feedback to the whistleblower regarding the outcome of the investigation and remedial action taken.

4.4 False Reports

Disciplinary action will be taken against any employee or volunteer who is found to have made a whistleblowing report maliciously. This may result in dismissal.

5. Definitions/Terminology Clarification

Whistleblowing is different to a complaint. A complaint is defined by FHP as "an expression of concern, dissatisfaction or frustration with the quality or delivery of service, a policy or procedure, or the conduct of another person" or a grievance, defined as "an alleged wrong or hardship suffered, which is the grounds of a complaint."

Whistleblower: defined by ASIC is 'In general, an insider within an organisation, who reports misconduct or dishonest or illegal activity that has occurred within that same organisation'.

Good faith: sincere belief or motive without malice.

Wrongful act: Includes but is not limited to acts such as criminal offences; mismanagement of funds; actual or suspected fraud; misinformation to public bodies; legal breaches such as negligence, breach of contract or breach or administrative law; endangerment of health, safety and the environment; abuse of authority; sexual abuse or other physical or mental harm caused to any individual inclusive of those who access and support FHP's programs; abuse of authority; breach of the FHP Code of Conduct; other unethical conduct. The suppression or concealment of any of the above.

6. Resources

ASIC Guidance for Whistleblowers
Disciplinary Action & Dismissal Handling Policy
Complaint and Complaints Handling Policy
Code of Conduct
Privacy Policy
Safeguarding Children & Young People Policy
Safeguarding Children & Young People Practice & Behaviour Guidelines
Team Member Handbook

7. Review

This Policy is reviewed on an annual basis.