



# GOV-007 Whistleblower Policy

References:	Corporations Act 2001 (Cth) Public Interest Disclosure Act 2013 (Cth)
Associated Policies/Procedures:	ACA Constitution FARM-007 – Financial Control and Fraud Prevention Policy GOV-004 – Privacy Policy Association's Codes of Conduct
Associated Forms:	

## 1. Introduction

The Board of The Australasian Corrosion Association Inc (the Association) is committed to operating legally in accordance with applicable legislation, organisational policy and procedures and ethically in all of its activities.

It is the responsibility of all Stakeholders to play an important role in establishing, maintaining and enhancing the reputation of the Association by ensuring observance of the high standards of ethics and conduct to which the Association is committed.

## 2. Purpose

This Whistleblower Policy is intended to encourage and enable Stakeholders to raise serious concerns internally so that the Association can address and correct inappropriate conduct and actions. It is the responsibility of all Stakeholders to report concerns about violations of the Association's codes of conduct or suspected violations of law or regulations that govern the Association's operations.

## 3. Scope

This policy applies to all Stakeholders.

## 4. Definitions

Term	Definition
EO	The Executive Officer of the Association (sometimes referred to as the Chief Executive Officer or CEO)
Reportable conduct	Conduct that is: a) illegal, dishonest, fraudulent or corrupt; b) in breach of Commonwealth or state legislation; c) in breach of other relevant policies and procedures, Codes of Conduct, employee employment and contractor contracts of the Association.
Stakeholders	Board Members, Committee Members, employees, contractors, consultants and Members of the Association



Whistleblower	A person who, whether anonymously or not, makes a report in connection with a reportable conduct and wishes to avail themselves of protection against reprisal harassment, or adverse employment consequence for having made the report
Whistleblower Investigations Officer	Someone appointed by the Association's Governance Committee (usually the Executive Officer) who is responsible to investigate the substance of any complaint regarding Reportable Conduct to determine whether there is evidence in support of the conduct raised or, alternatively, to refute the complaint made

## 5. Reporting

Any person who wishes to raise concerns regarding Reportable Conduct should do so by contacting the Whistleblower Investigations Officer. If, for some reason, it is not appropriate to report to the Whistleblower Investigations Officer, the Whistleblower may contact the Chair of the Association or any other member of the Governance Committee.

Contact with the Whistleblower Investigations Officer will be by [secretary@corrosion.com.au](mailto:secretary@corrosion.com.au).

If the Whistleblower has any personal interest in the matter, it is essential that this is made known to the Whistleblower Investigations Officer at the outset. The Whistleblower raising a concern of Reportable Conduct will not be expected to produce irrefutable evidence to support the concerns raised. All that is required is that the Whistleblower has a genuine concern regarding the Reportable Conduct and that the concern is raised in good faith. It is in the Association's interests to hear of suspicions of Reportable Conduct at the earliest possible opportunity.

## 6. Confidentiality

If the Whistleblower does not wish to be identified (other than to the Whistleblower Investigations Officer), they should say this at the first possible opportunity so that appropriate arrangements can be made, recognising that this may impair investigation of the disclosure. In these circumstances the Association will take all reasonable steps to ensure that information received from the Whistleblower is held securely and in confidence. The information, including the identity of the Whistleblower, will only be disclosed where:

- the Whistleblower has been consulted and has consented in writing to the disclosure;
- the Whistleblower Investigations Officer is required by law to do so;
- the disclosure is to law enforcement, a legal practitioner for the purpose of obtaining legal advice; or
- the disclosure is reasonably necessary to investigate the issues raised and all reasonable steps are taken to ensure that the discloser's identity is not disclosed.

The Whistleblower (if an employee of the Association) may request a leave of absence during any investigation if it is not possible to maintain the Whistleblower's anonymity.

## 7. Investigation

Reports of Reportable Conduct will be thoroughly investigated by the Whistleblower Investigations Officer with the view of substantiating or refuting the claims made by the Whistleblower in a timely manner.

However, vague anonymous complaints, lacking in sufficient information to allow an investigation, may not be investigated.



## 8. Outcome

It is the obligation of the Whistleblower Investigations Officer, following completion of their investigation, to ensure that:

- a) all verifiable Reportable Conduct is dealt with appropriately; and
- b) systemic or recurring Reportable Conduct is reported to those with sufficient authority to correct it.

## 9. Feedback

The Association will ensure that the Whistleblower is promptly informed of the outcome of the investigation of their report, subject to considerations of privacy of those against whom allegations have been made and the customary confidentiality practices of the Association. If the Whistleblower is not an employee, then the provisions of this clause may apply once the Whistleblower has agreed in writing to maintain confidentiality in relation to any information provided in relation to their report.

## 10. Consequences of reporting – proper reporting

The Association 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 is not at risk of losing their employment, their role within the Association or suffering any form of reprisal for coming forward. It does not matter whether the suspicion proved to be unfounded or real. The Association will protect the Whistleblower who raises a genuine concern and will not tolerate the harassment or victimization of, or discrimination against, such a Whistleblower or their family, relatives or colleagues. The Association will deal with any such harassment, victimization or discrimination under the disciplinary and/or harassment procedures of the Association.

## 11. Consequences of reporting – improper reporting

If it is shown that the Whistleblower has made a false report of Reportable Conduct (being one which is raised other than in good faith and which raises a matter which they know or believe to be untrue) then this will be regarded as misconduct by the Whistleblower and will be dealt with through the relevant employment, disciplinary or contractual procedures.



## 12. Policy review

Nothing prevents the Governance Committee from amending this policy from time to time. Any amendments will be subject to Board approval. This policy is to be reviewed every three years.

This policy is to be available to Members on the Association's website.

Version	Change details	Reviewed by	Date reviewed	Approved by	Approval date
1.0	Policy development	GovCom	6 Jul 2017	Board	31 Jul 2017
2.0	Update and new template	GovCom	9 Aug 2024	Board	18 Sep 2024