

SSGAC Whistleblower Policy

1. Definitions:

Club refers to the South Sydney Graphic Arts Club Mascot (SSGAC).

Misconduct means poor or unacceptable practice and breaches of internal rules or policy relating to the Club and its community including its officeholders, its employees, suppliers, members or guests.

Disclosure means providing information about actual or suspected Misconduct.

Whistleblowing means a Disclosure by (or for) a witness of actual or suspected Misconduct.

Whistleblower/Discloser means a person who discloses actual or suspected Misconduct.

Whistleblower Investigation Officer (WIO) means a person who is responsible for leading, co-ordinating or overseeing the investigation of the Disclosure and for protecting the Whistleblower.

2. Purpose of this Policy

The South Sydney Graphic Arts Club Mascot (SSGAC) is committed to developing a culture where all staff are encouraged to raise concerns about Misconduct and can do so safely.

The purpose of this policy is to promote responsible Whistleblowing about issues where the interests of the Club and its community are at risk. Such issues might include:

- a criminal offence
- the breach of a legal obligation
- misuse of resources
- financial impropriety
- a danger to the health or safety of any individual
- damage to the environment
- deliberate covering up of information tending to show circumstances of this kind.

The Club aims to encourage Disclosure of Misconduct by providing convenient and safe disclosure mechanisms and protection for Whistleblowers. All members of the Club and its community share a responsibility to:

- speak up and disclose Misconduct by others involved in the Club; and
- ensure that those who do speak with good intentions and for a proper purpose can do so without being personally disadvantaged as a result.

The Whistleblower Policy is not intended to obstruct any person from reporting possible violations of law or regulation to any appropriate law enforcement, governmental agency or regulatory body.

3. Obligations of Whistleblower

3.1 The Whistleblower Policy is about disclosing and dealing with serious and illegal practices. It is not about simply airing a personal grievance with another person or recording a disagreement with a decision that has been validly made or the way something is done. Conventional complaint procedures should be used for those purposes.

3.2 The person making a Disclosure should have reasonable grounds to suspect that a person involved in the Club has engaged in Misconduct and share whatever information they have available to them in respect of the Disclosure.

3.3 A Disclosure must be made in 'good faith' which means it must be honest, genuine, and motivated by wanting to disclose Misconduct. Allegations which are considered by the Club's WIO to be vexatious, malicious, motivated by revenge, motivated by personal (or business) gain or motivated by a desire to harm the reputation of another will not result in Whistleblower protections and may be viewed as a disciplinary offence.

4. Obligations of Club

- 4.1** The Club will encourage employees to report matters that may genuinely cause financial or non-financial loss or damage to the Club or its community.
- 4.2** The Club will provide clear outlines of all reporting channels.
- 4.3** The Club will support confidential reporting, as well as processes for raising concerns anonymously.
- 4.4** The Club will ensure that a person who discloses actual or suspected Misconduct can do so without being personally disadvantaged as a result of Whistleblowing.

5. Obligations of Whistleblower Investigation Officer (WIO)

- 5.1** The WIO will evaluate whether a Disclosure may potentially fall within the scope of the Whistleblower Policy.
- 5.2** The WIO will investigate the Disclosure in a fair, confidential, objective and timely manner.
- 5.3** The WIO will deal effectively and fairly with reports in a way that will protect the identity and security of a Whistleblower and provide secure storage of any information provided.
- 5.4** The WIO will provide mentoring and other support to the Whistleblower deemed necessary.
- 5.5** The WIO will keep the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom a Disclosure has been made.

6. Procedure for Reporting Concerns

- 6.1** If a member of the Club community has a concern that another person in the Club community has engaged in Misconduct, they should disclose that concern by reporting it to the Whistleblower Investigation Officer (WIO) in person or by phone, email or mail. The Club has two WIOs so if it is not appropriate - for any reason – to report to one, another is always available.
- 6.2** If the WIO thinks the matter should be pursued through the grievance procedure instead of through this policy, they will advise the Discloser accordingly.
- 6.3** When Misconduct is reported under this policy, the Discloser should provide as much information as possible. Information such as dates, times, location, individuals involved, other witnesses, physical evidence (e.g. documents, images) and any other general information may be helpful to assist the WIO to determine how to take appropriate action.
- 6.4** If the Discloser has any personal interest in the matter, it is essential that this is made known to the WIO at the outset.
- 6.5** The WIO will note the key points of the concern and decide what action to take. This may include initiating an internal investigation, a more formal inquiry or taking alternative appropriate action.
- 6.6** The WIO manager will inform the Discloser about the action to be taken and keep them informed about what is happening as far as possible, without infringing on another's confidentiality and with respect to privacy.
- 6.7** If required, the matter may be referred to the police and/or other external bodies for investigation. Nothing in this policy prohibits the Club from sharing information with the police, law enforcement and regulatory bodies and any other relevant external bodies.

7. Protection of Whistleblowers

- 7.1** When making a Disclosure, a Whistleblower can choose to disclose their identity or remain anonymous. It should be noted that anonymous reports may limit the investigation including the inability to provide feedback on the outcome.
- 7.2** The WIO will do everything possible to protect a Whistleblower's identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing a Whistleblower's identity, the WIO will discuss with the Whistleblower whether and how to proceed.
- 7.3** The WIO will oversee protection and welfare of the Whistleblower to ensure that the Whistleblower is not personally disadvantaged as a result of making the Disclosure by:
- Dismissal
 - Demotion
 - Any form of harassment
 - Discrimination
 - Current or future bias.
 - Any form of reprisal.
- 7.4** In addition, a confidential support and counselling program (Employee Assistance Program) is available to all staff.
- 7.5** The Club will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will deal with any such occurrences under the disciplinary and/or harassment procedure.

Whistleblower Investigation Officers as of June 2019

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