



Returned & Services Leagues of Australia
(Queensland Branch)

WHISTLEBLOWER POLICY

Title	Whistleblower Policy
Policy Number	POL09
Version	V1.2
Authorised by	Board
Policy Owner	Board
Date Adopted	July 2016
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Related Documents	Code of Conduct Policy Board Code of Conduct Conflict of Interest Policy Fraud, Bribery and Corruption Policy Workplace Health and Safety Policy

INTRODUCTION

The Returned & Services League of Australia (Queensland Branch) (RSL (Qld)) has established the Whistleblower Policy for the following reasons:

- to encourage the 'blame free' reporting of matters that may amount to breaches of statutory, regulatory or codified obligations
- to promote a healthy and balanced culture of compliance throughout RSL (Qld)
- to promote a healthy and safe working environment
- to reinforce the fact that RSL (Qld) is committed to, and serious about, its legal and corporate governance obligations.

PURPOSE

The purpose of this Policy is to help the RSL (Qld) to effectively manage a process for disclosure of Reportable Conduct.

RSL (Qld)'s Whistleblower Policy complements RSL (Qld)'s Code of Conduct and reinforces our culture of open communication, doing what is right, and encouraging employees and volunteers to speak up and report corrupt, illegal or undesirable conduct.

This Policy has been developed in line with Australian Standard 8004-2003 "Whistleblowing protection programs entities", for situations where an employee wishes to disclose incidents of Reportable Conduct but has formed the view, on reasonable grounds, that RSL (Qld)'s normal reporting processes are not appropriate in the particular instance.

APPLICATION

This Whistleblower Policy applies to all employees, who, for the purpose of this Policy, shall be taken to mean Directors, employees, volunteers and contractors of RSL (Qld). In addition, this Policy applies to employees and volunteers of Mates4Mates. Referred to in this Policy as "Employees".

POLICY STATEMENT

RSL (Qld) is committed to encouraging all Employees to be responsible for speaking up and reporting corrupt, illegal or undesirable conduct.

An individual who discloses Reportable Conduct may be protected from civil and criminal liability. This is referred to as "protected disclosure".

Protected disclosure includes protection from a breach of the confidentiality clause in the Employee's employment contract, contractor agreement or any other agreement.

An Employee cannot be terminated, demoted, harassed, discriminated against or shown any bias from RSL (Qld) after having made a protected disclosure and RSL (Qld) must take reasonable steps to ensure that the Employee is not subjected to victimisation or persecution.

The provisions offered under protected disclosure may not be available to an Employee who makes a disclosure that is not based on reasonable grounds, is malicious or where the Employee was involved in the Reportable Conduct.

Protection and assistance will be offered to Employees who make a disclosure of Reportable Conduct against their manager or a colleague. This may include:

- placing the Employee on temporary paid leave as applicable;
- relocating the Employee either temporarily or permanently;
- redeploying the Employee to another role, either temporarily or permanently as applicable;
- offering the Employee access to the Employee Assistance Program.

RSL (Qld) will take reasonable measures to ensure that Employees are aware of, and understand the Whistleblower Policy, and the types of behaviour or scenarios that are reportable.

IMPLEMENTATION

Employees are responsible for contacting a suitably senior member of RSL (Qld), for example:

- General Manager People and Culture
- any Executive Manager
- Company Secretary
- Director
- Member of the Legal Team

- Other appropriate Senior Manager and disclosing an allegation of Reportable Conduct in order for a complaint to be investigated.

The allegation will then be forwarded to the General Counsel for investigation.

The procedure associated with reporting and investigation of Reportable Conduct is an Employee may make a report under this Policy or under the Fraud, Bribery and Corruption Policy.

RESPONSIBILITIES

RSL (Qld) is committed to appointing and maintaining an appropriately qualified Whistleblower Protection Officer. The General Counsel is designated as RSL (Qld)'s representative with the responsibility of protecting and safeguarding the interests of whistleblowers.

Employees may make a disclosure anonymously or ask the General Counsel that their identity not be disclosed. RSL (Qld) is committed to protecting Employees who make genuine disclosures and all reasonable efforts will be made to ensure that anonymous disclosures remain anonymous. However anonymity cannot be guaranteed in certain circumstances (e.g. legal papers, court orders).

The CEO and management at all levels will be held accountable for the quality of response to issues disclosed by whistleblowers and to reports of retaliation as well as for supporting policies that ensure misconduct at RSL (Qld) is disclosed.

INVESTIGATIONS

RSL (Qld) is also committed to appointing and maintaining an appropriately qualified Whistleblower Investigations Officer. The nominated Whistleblower Investigations Officer is responsible for investigating the Reportable Conduct and advising any other relevant RSL (Qld) business area as appropriate (e.g. People, and Culture, and Finance) so that a plan can be developed to investigate the disclosure.

While the responsibility for ensuring investigations are completed thoroughly and on a confidential basis in a timely manner, the General Counsel will ensure that an appropriate person is nominated as the Whistleblower Investigations Officer to manage an investigation, and any resulting action(s).

Due to confidentiality constraints, the outcome of any investigation, and resulting action taken by RSL (Qld), may not be made available to the Employee who made the disclosure.

All investigations will be conducted in a manner that is consistent with the rules of natural justice and devoid of bias or prejudice against the Employee or any person against whom the allegation is made.

BREACH

Compliance with this Policy is a condition of employment or ongoing engagement with RSL (Qld). Breaches of this Policy will lead to disciplinary action up to and including termination of employment or of association.

All suspected breaches of this Policy must be reported to the General Counsel on 07 3634 9432 or alternatively via email on whistleblower@rslqld.org. The identity of the person reporting the breach will be protected where possible.

RSL (Qld) will monitor and review this Policy regularly to assess its effectiveness in encouraging the reporting of reportable conduct, protection of persons making reports, investigating fairly and effectively and rectifying verified wrongdoing.

This monitoring will be facilitated by reports to the Audit and Risk Committee and/or the Board that will not compromise confidentiality. A report is to be provided to the Board of the outcome of each review.

FURTHER ASSISTANCE

For questions about this Policy, contact the General Counsel.

RELATED DOCUMENTS

Code of Conduct Policy

Board Code of Conduct

Conflict of Interest Policy

Fraud, Bribery and Corruption Policy

Workplace Health and Safety Policy

REVIEW PROCESS

This Policy will be reviewed annually by the General Counsel to ensure that it remains effective and relevant to RSL (Qld) and that it continues to comply with relevant laws.

DEFINITIONS

Whistleblowing is a term used to describe a situation whereby an employee is able to make a voluntary disclosure about reportable conduct within, or concerning, RSL (Qld), but feels they are unable to make the disclosure via their usual reporting lines.

Reportable Conduct includes (but is not limited to) activities that are:

- illegal;
- corrupt;
- fraudulent;
- dishonest;
- unethical;
- unlawful;
- constituting an unsafe work-practice;
- constituting serious improper conduct; or
- giving rise to the possibility of causing financial or non-financial loss to RSL (Qld), or might otherwise be detrimental to the interest of RSL (Qld).