

Whistleblower Policy

1. Purpose

This Whistleblower Policy is designed to encourage and protect people who report suspected wrongdoing within Camden Meals on Wheels. The purpose of this policy is to:

- Promote a culture of honesty, integrity, and accountability.
- Provide a safe and confidential way to raise concerns about misconduct or unlawful behaviour.
- Protect whistleblowers from victimisation, retaliation, or disadvantage.
- Ensure concerns are handled promptly, fairly, and transparently.

2. Scope

This policy applies to:

- All employees (permanent, part-time, casual, and temporary);
- Volunteers;
- Board and committee members;
- Contractors, suppliers, and consultants; and
- Any other person who performs work for or with Camden Meals on Wheels.

It covers disclosures about suspected or actual misconduct, including but not limited to:

- Fraud, corruption, or theft;
- Misuse of organisational resources;
- Dishonest, unethical, or unlawful conduct;
- Breaches of legislation, regulation, or internal policy;
- Harassment, discrimination, or bullying;
- Dangers to the health and safety of individuals; and
- Any deliberate concealment of the above.

3. What Is Not Covered

This policy does not cover personal work-related grievances (e.g., interpersonal conflicts or dissatisfaction with employment conditions) unless the grievance involves victimisation after making a whistleblower report or raises issues of systemic misconduct.

4. Making a Disclosure

A disclosure can be made if the whistleblower has reasonable grounds to suspect wrongdoing.



Disclosures can be made confidentially or anonymously through any of the following channels:

- Internal:

- President
- Chair of Governance (if the concern involves the President after which time the Chair of Governance will liaise with the Board)
- Whistleblower Protection Officer

- External (if appropriate):

- The Australian Charities and Not-for-profits Commission (ACNC)
- The Australian Securities and Investments Commission (ASIC)
- The Australian Federal Police (AFP)

Whistleblowers are encouraged to provide as much detail as possible, including dates, people involved, and supporting evidence if available.

5. Protection for Whistleblowers

Camden Meals on Wheels will ensure that anyone who makes a report under this policy:

- Is treated with respect and fairness;
- Is protected from dismissal, demotion, harassment, discrimination, or any form of retaliation; and
- Has their identity kept confidential (unless disclosure is required by law).

Retaliation or victimisation against a whistleblower is a serious matter and may result in disciplinary action, including termination of employment or engagement.

6. Investigation of Disclosures

All reports will be assessed promptly to determine if an investigation is warranted.

Investigations will be:

- Conducted objectively and impartially;
- Led by a qualified internal or external investigator; and
- Completed as quickly as possible, consistent with due process.

The whistleblower will be informed of the progress and outcome of the investigation, to the extent appropriate.

7. Confidentiality

The identity of the whistleblower and any details that may identify them will be kept strictly confidential, unless:

- The whistleblower consents to disclosure;
- Disclosure is required by law; or
- Disclosure is necessary to prevent a serious threat to health or safety.



All records relating to disclosures and investigations will be securely stored.

8. Roles and Responsibilities

- **Board:** Oversight of policy implementation and ensuring appropriate action is taken on substantiated findings.
- **President:** Ensures reports are properly investigated and supports a culture that encourages ethical behaviour.
- **Whistleblower Protection Officer:** Provides confidential advice, supports whistleblowers, and monitors retaliation risks.
- **All Personnel:** Must report suspected misconduct and cooperate with investigations in good faith.

9. Policy Review

This policy will be reviewed every two years, or sooner if required by changes in legislation or organisational practice.