



# WHISTLEBLOWER POLICY

## 1. INTENT

SUSF wishes to encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage whistleblower disclosures, and explain the protection for individuals who disclose wrongdoing. With our whistleblower policy, we aim to ensure that:

- Individuals have the chance to speak up when they become aware of actual or suspected misconduct covered by this policy. They should have a pathway to report misconduct. Every report will be heard and assessed, and where appropriate we will make improvements based on the results.
- Reports can be made confidentially and without fear of detrimental action or retaliation.
- There is a pathway for SUSF to conduct an investigation following a report of misconduct.
- At the end of an investigation, we may document the results and provide feedback when appropriate.

## 2. SCOPE

This policy applies to all current and former permanent, part-time, maximum-term and casual staff. It also applies to all contractors, consultants, service providers, associates, suppliers and business partners, and any other person within the definition of 'eligible whistleblower' set out in the *Corporations Act*.

## 3. POLICY

### What conduct should be reported?

This policy covers actual or suspected conduct relating to SUSF that is or may be:

- Fraudulent;
- Illegal;
- Corrupt;
- Dishonest or unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Represents a danger to the public or financial system;
- Any conduct which is likely to cause financial or non-financial loss to SUSF;
- Indicative of gross mismanagement or an otherwise improper state of affairs.

A disclosure should be made where a person covered by this policy has reasonable grounds to believe this kind of misconduct has occurred. Where the issue is an individual work-related concern, this policy will not apply and the person should raise the concern in accordance with the SUSF Complaints Resolution Policy. If a person is unsure about the appropriate pathway to raise an issue, they may seek guidance from Human Resources or Legal.



### **What options do you have for making a disclosure?**

If a person covered under the scope of this policy would like to make a disclosure, they have different channels available where they can do this, including:

- By email to [legal@sport.usyd.edu.au](mailto:legal@sport.usyd.edu.au);
- Via post to SUSF Legal Counsel, SUSAC, Building G09, Sydney University NSW 2006;
- Speak confidentially with your Senior Manager;
- Speak with the owner of SUSF's whistleblowing program, SUSF Legal Counsel; and/or
- Speak with SUSF's external Employment Law And Workplace Specialists, Workdynamic via [complaints@workdynamic.com.au](mailto:complaints@workdynamic.com.au).

### **Confidentiality of reports**

Confidentiality will be maintained as far as is possible in whistleblowing matters. Our preference in all whistleblowing matters will be to act with the understanding and consent of the person making the disclosure.

A person covered by this policy may choose to make an anonymous disclosure. Subject to compliance with legal requirements, SUSF will generally only share your identify or information likely to reveal your identity if you consent, if the concern is reported to a regulatory authority such as the Australian Federal Police (AFP), or for the purpose of obtaining legal advice. Information contained in a disclosure may be disclosed without consent provided the information does not include your identity, and SUSF has taken all reasonable steps to reduce the risk you will be identified and the action is reasonably necessary for investigating the issues raised.

It is worth noting that SUSF will make every endeavour possible to investigate an anonymous report, but there are limitations of what can be achieved if a discloser decides to remain anonymous.

### **The investigative process**

SUSF will assess matters reported under this policy as soon as practicable. The process for assessment and investigation of a whistleblowing disclosure will generally involve the following steps:

1. Whistleblowing disclosure (anonymous or otherwise) is received.
2. The recipient of the disclosure on behalf of SUSF will confirm receipt and ensure the content is assessed in order to understand the nature of the concern and the scope to investigate.
3. Where appropriate, an investigator will begin an investigation. The investigation will be objective, fair and impartial. The first step in this process will usually be to seek as much information as possible from the person making the disclosure.
4. The investigator may provide confidential updates to SUSF management (or the CEO or the Board, depending on the nature of the disclosure) and the person making the disclosure during the investigation. At the conclusion of the investigation, SUSF will provide feedback to a discloser regarding the investigation progress and/or outcome (subject to consideration of the privacy of those against whom allegations are made).

### **Protection of whistleblowers**

SUSF will not tolerate any attempts to take detrimental action against a person who has made a whistleblowing disclosure. Detrimental action may include dismissal, demotion, harassment, discrimination, disciplinary action, threats or other unfavourable treatment.



Any employee or associated person who is found engaging in such conduct will face disciplinary action, including the potential to be terminated from their role. If a person who has made a disclosure becomes concerned about being subject to detrimental treatment as a result of the disclosure, this should be raised with SUSF immediately.

#### **Reporting to the Board of Directors**

The Board of Directors is updated regularly on SUSF's whistleblowing program, inclusive of disclosures, investigations and results. Disclosures or investigations carrying an undue amount of risk will be reported to the Board of Directors outside of the regular updates. The Board of Directors at any time can ask about anonymous disclosures, investigations, as well as the state of SUSF's whistleblowing program.

#### **4. ABOUT THIS POLICY**

Subject	Whistle-blower Policy
Authorised by	Chief Executive Officer
Contact	Legal
Version	1.0
Commencement	27 February 2020
Next review	01 July 2021