WHISTLE-BLOWER POLICY

Purpose

Partners For Equity ("PFE") is committed to creating and maintaining a transparent, open and accountable working environment. PFE expects all its directors, staff and volunteers, and those of its international partners, to report concerns about a serious breach to a senior manager or a director. PFE also encourages other stakeholders to report concerns in good faith.

How to Make a Report

Where a person feels unable to raise a concern through standard feedback channels because of reasonable grounds to fear reprisal, he/she may email his/her concern to info@partnersforequity.org where it will be dealt with by the Board of Directors of PFE in accordance with this policy.

A person who wishes to raise a concern about PFE can also contact the Australian Charities and Not-for-Profits Commission using its online link - https://www.acnc.gov.au/raise-concern/concerns-about-charities/how-raise-concern or by phoning 13 22 62.

This policy will be available on PFE’s website and/or upon request; and reviewed regularly by the Board of Directors of PFE.

Reports by Whistle-blowers

1. Whistle-blowers considering making a report must have reasonable grounds for believing the allegation has occurred or is about to occur.
2. Whistle-blowers must indicate they are making a protected disclosure of a serious matter (refer to the examples of serious matters or breaches below).
3. Whistle-blowers must ensure as far as possible that allegations are factually accurate, complete, from first-hand knowledge and are presented in an un-biased fashion.
4. All allegations will be treated seriously and be subject to a thorough investigation.
5. A Whistle-blower or any other person who has participated in good faith in an investigation will not be subject to a reprisal.
6. Online reports are preferable, however if a verbal report is made, it must be documented in the form of a witness statement and signed by the Whistle-blower.

The confidentiality of the person making a report will be respected, however there may be instances where it is necessary to reveal his/her identity to a limited group to enable a fair and thorough investigation, lessen a serious threat to a person’s safety and/or is required by law. While anonymous reports may be made, they may be more difficult to investigate if the information provided is unclear or insufficient.
Any allegation that a person has engaged in a reprisal contrary to the requirements of these guidelines will be investigated and the matter treated seriously. If proven to have occurred, it will expose the wrongdoer to the risk of a disciplinary response including termination of employment.

If a Whistle-blower is found not to have acted in good faith or to have made a false allegation (including if made maliciously, vexatiously or without reasonable cause), the Whistle-blower may be exposed to a disciplinary response including termination of employment.

Examples of Serious Matters or Breaches which may be raised under this policy

Serious breaches may include (but are not limited to) conduct that:

- breaches PFE’s Child Protection Policy, or any policy of any of PFE’s international partners which is designed to protect children and other vulnerable persons;
- breaches PFE’s Policy on Safeguarding against Terrorism Financing; or any policy of any of PFE’s international partners which is designed to prevent terrorism financing, money-laundering or any other financial impropriety;
- is dishonest, fraudulent, corrupt, illegal or unethical;
- involves mismanagement or waste of PFE funds;
- could cause financial or non-financial loss to PFE;
- is materially detrimental to the interests, reputation and good standing of PFE;
- is an abuse of authority, position or information; or
- poses a serious risk of harm to an employee, beneficiary or volunteer of PFE, or any of its international partners, including to their health, safety or environment.

THIS POLICY WAS APPROVED BY THE BOARD OF DIRECTORS OF PARTNERS FOR EQUITY
14th January 2020