

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**