

WHISTLEBLOWER POLICY

Document Control	
Document Title	Whistleblower Policy
Document ID	GOV-001
Version	V1.0
Author	Sarah Rogers, Country Director
Review Date	19 January 2026
Reviewer	Nicky Mih, Managing Director
Approval authority	Board
Approval	Merewyn Foran, Board Chair
Approval date	5 May 2026
Board Resolution	Board Meeting 49; May 2026
Effective date	May 2026
Next review date	April 2029
Policy Status	Approved

WHISTLEBLOWER POLICY

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1. PURPOSE AND SCOPE

Free To Shine (FTS) is committed to integrity, accountability and child safety. FTS promotes an environment where speaking up is encouraged, safe, and supported. This Whistleblower Policy exists to encourage and protect people who speak up about suspected wrongdoing connected to FTS's work.

This policy applies to:

- Employees (full-time, part-time, casual)
- Volunteers, interns and students
- Consultants and contractors
- Board members
- Partner organisations and their workers
- Clients and community members, where applicable.

This policy should be read with FTS's Code of Conduct, Complaints and Feedback Policy, Child Protection Policy, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and Financial Policy. Detailed procedures for making and managing whistleblower disclosures are set out in the FTS Whistleblower Procedures.

2. WHAT IS WHISTLEBLOWING?

For this policy, whistleblowing means reporting, in good faith, reasonable concerns about serious wrongdoing connected to FTS, its people, programs fundraising or the communities we work with. A report is made in good faith when the person honestly believes, on reasonable grounds, that the information is true or may be true, even if it is not ultimately substantiated by an inquiry.

Examples include but are not limited to:

- Fraud, theft, bribery, corruption or misuse of organisational funds or assets
- Child abuse, exploitation, trafficking, grooming or other serious safeguarding concerns
- Sexual exploitation, abuse or harassment (SEAH)
- Serious breach of FTS's Code of Conduct or organisational policies
- Criminal offences or failure to comply with the law
- Serious health and safety risks to employees, children, or community members
- Serious conflicts of interest or abuse of power
- Systemic cover-up or deliberate concealment of any of the above.

Whistleblowing under this policy does not include:

- Personal employment or performance grievances affecting only one individual without broader wrongdoing (managed through HR policies)
- Ordinary service complaints or program feedback (managed through the Complaints Handling and Feedback Policy).
- Malicious, knowingly false or vexatious reports or reports made purely for personal gain.

Unsure if it is a whistleblower matter?

If you are unsure whether your issue is a whistleblower matter or a complaint, you should still report it in your own words. FTS will direct it to the right process and prioritise your safety. Complaints about serious or systemic wrongdoing will be handled under this whistleblower policy. We also have reporting channels for child safeguarding and SEAH concerns. The Whistleblower Protection Officer will determine the best channel for your report.

3. HOW TO REPORT A CONCERN

You can report a concern using any of the following reporting channels:

- **Whistleblower Protection Officer (primary contact)**
The Whistleblower Protection Officer is the main contact for whistleblower reports.

Email: **speakup@freetoshine.org**
- If you cannot report to the Whistleblower Protection Officer because the concern involves someone in the Operations or Human Resources team, or you do not feel safe raising it with the Whistleblower Protection Officer, you may report directly to the Country Director or Managing Director. Should the concern involve the Managing Director or the Board of Directors, the report should be made to the Chair of the Board.
- **Trusted internal contacts**
You may speak with a trusted staff member, your manager or another senior leader, who can help you make a report through the channels above.
- **Child Protection Officer (CPO)**
Where the concern involves child protection or safeguarding, you may report directly to the Child Protection Officer.
Email: **report@freetoshine.org**
- **Written or verbal report**
You can complete a complaint/report form or give a verbal report. It will then be passed to the appropriate person listed above.

Anonymous reports

FTS promotes an environment where speaking up is encouraged, safe, and supported. When investigating whistleblower reports we may ask follow-up questions, clarify information and provide feedback to you. Occasionally a person may choose to report anonymously. Anonymous reports are accepted. Incomplete reports may limit the effectiveness of an investigation. If you make an anonymous report please provide comprehensive information (include details, dates, people involved, anything specific) to support an investigation.

4. PROTECTION AND RIGHTS

4.1 Core principles

FTS's approach to whistleblowing is guided by the following principles:

- **Safety first:** Protect children, survivors, employees, volunteers, and communities from harm.
- **Good faith:** We encourage people to report honestly held concerns without needing to prove them.
- **No retaliation:** Anyone who raises a concern in good faith will be protected from victimisation, harassment, dismissal, demotion, discrimination or other retaliation.
- **Confidentiality:** Information will be shared only on a strict "need-to-know" basis, and identities will be protected wherever possible and lawful.
- **Fairness to all parties:** Concerns will be handled in a way that respects the rights and dignity of complainants, whistleblowers, respondents, and witnesses.
- **Independence:** Serious disclosures and those involving senior employees, management or board members may be escalated to independent or external bodies.
- **Transparency and accountability:** Whistleblower disclosures and responses will be documented, with anonymised reporting to leadership and the board so that systemic issues are addressed.

4.2 Confidentiality

FTS is committed to protecting whistleblower identities and sensitive information. The identity of a whistleblower, or information likely to identify them, will be kept confidential and disclosed only:

- To people who need the information to assess or address the concerns
- As required or permitted by law
- With the whistleblower's consent, where appropriate.

Whistleblower reports and subsequent investigations will be stored securely in line with organisational record-keeping and data protection practices.

Where a matter must be reported to external authorities (such as police or child protection authorities), FTS will take reasonable steps to safeguard the whistleblower's safety and privacy within legal limits.

Where complete anonymity is requested and feasible, FTS will respect this and explain any limitations it may place on possible actions.

4.3 Protection from retaliation

Retaliation against a whistleblower, or anyone who supports or participates in an inquiry, is strictly prohibited. Retaliation includes but is not limited to:

- Dismissal, demotion, reduction of hours or negative changes to duties
- Intimidation, threats, harassment, bullying or isolation

- Damage to reputation or career prospects or denial of training opportunities
- Any other form of punishment or disadvantage because a person raised or helped address a concern.

FTS will:

- Take all reports of retaliation seriously
- Act promptly to stop and remedy retaliation where it occurs
- Treat proven retaliation as serious misconduct, which may lead to disciplinary action up to and including dismissal, or termination of contracts or partnerships.

Protection from retaliation applies regardless of whether the reported concern is ultimately substantiated, provided the report was made in good faith.

4.4 Rights of respondents

Individuals against whom allegations are made (respondents) have the right to:

- Be informed that allegations have been made against them (subject to risk, safety and legal considerations)
- Necessary investigations being conducted with care and respect, including reasonable opportunity to respond to allegations
- Support during any inquiry, investigation or internal process.
- Confidentiality to the extent practical and consistent with safety and legal obligations

Whistleblower protections ensure reports can be made safely so concerns can be properly assessed; they do not require FTS to accept all allegations as true

4.5 Support for whistleblowers

FTS recognises that speaking up about serious concerns can be stressful and may create personal, cultural or professional risks for the whistleblower.

As far as practicable, FTS will:

- Offer access to support services (for example, counselling or peer support where available) and consider reasonable adjustments to the person's working arrangements to support safety and wellbeing
- Maintain periodic communication with the whistleblower about the status of the matter, within confidentiality and legal limits
- Take cultural and language needs into account, including providing information in accessible formats and languages where possible.

5. HOW REPORTS ARE HANDLED

This section explains FTS's general approach to handling whistleblower reports. Detailed step-by-step processes are described in the FTS Whistleblower Procedures.

FTS will:

1. Receive and acknowledge reports as soon as reasonably possible, taking into account the reporting channel and safety of the people involved.
2. Respond to immediate safety risks, especially for children and people at risk
3. Decide which policy or process applies and whether any external authorities, regulators or donors need to be notified.
4. Arrange an appropriate inquiry or investigation, which may be carried out internally, by an independent person, or by external authorities.
5. Decide and implement proportionate actions, which may include changes to systems and controls, disciplinary action, ending employment or contracts, reporting to donors or regulators, or taking no further action where concerns are not substantiated.
6. Provide the whistleblower, where contact is possible, with general information about the progress and outcome of the matter, subject to privacy, safety and legal constraints.
7. Keep secure records of reports, actions and outcomes, and use anonymised information to identify trends and strengthen organisational systems, culture and risk management.

6. ROLES AND RESPONSIBILITIES

All employees, volunteers, contractors and partners who are aware of possible wrongdoing covered by this policy have a responsibility to disclose that information through the reporting channels in Section 3.

All employees, volunteers, contractors and others working with FTS

- Act ethically and comply with FTS's policies.
- Report suspected wrongdoing and cooperate with inquiries.
- Must not retaliate against anyone who speaks up or participates in inquiries.

Board

- Promote an environment where speaking up is encouraged, safe, and supported.
- Investigate reports made, as appropriate to the Board role.
- Analyse and receive anonymised reports on significant whistleblower matters and systemic issues, using the learnings and identified trends to strengthen the organisation.

Managing Director, Country Director and Managers

- Oversee the implementation of policies that support ethical conduct and accountability.
- Promote an environment where speaking up is encouraged, safe, and supported.
- Ensure adequate resourcing for secure reporting channels, training, and appropriate follow-up actions.
- Respond appropriately and sensitively to concerns when they are raised.
- Investigate reports made as appropriate to the role.

- Escalate any potential whistleblower matters immediately, in accordance with established procedures.

Supervisors

- Promote an environment where speaking up is encouraged, safe, and supported.
- Respond appropriately and sensitively to concerns when they are raised.
- Escalate any potential whistleblower matters immediately, in accordance with established procedures.

Whistleblower Protection Officer

- Act as key contact point for receiving whistleblower reports
- Ensure concerns are treated seriously, confidentially and passed to appropriate decision-makers
- Investigate reports made as appropriate to your role
- Help coordinate internal or external responses in line with relevant procedures.

7. EXTERNAL REPORTING AND ACFID CODE

This policy sits alongside whistleblower protections in the Corporations Act 2001 (Cth). If an eligible whistleblower reports certain types of misconduct to an eligible recipient (for example an FTS officer or senior manager, our authorised Whistleblower Protection Officer, our auditor, a financial regulator or a lawyer for legal advice), they may receive additional legal protections. These include keeping their identity confidential, protection from victimisation, and protection from certain legal actions in relation to their disclosure, including where it is made anonymously.

FTS aligns with the ACFID Code of Conduct, which requires:

- Accessible, safe and responsive mechanisms for reporting concerns and misconduct
- Protection for those who raise concerns in good faith
- Transparent handling of serious misconduct, including safeguarding and corruption.

Your right to report externally

A whistleblower may choose to report concerns internally, externally, or both, depending on the nature of the issue and their safety.

In certain circumstances, FTS has legal obligations to report matters to police, child protection authorities or other regulators in Australia or Cambodia. FTS will comply with these obligations and will not attempt to prevent a whistleblower from making a report to an appropriate external authority.

8. COMMUNICATION AND TRAINING

This policy will be available in accessible format and language for the people and communities FTS works with.

FTS provides training and awareness-raising on speaking up, whistleblower protections and reporting channels for employees and other key representatives.

FTS uses learnings from whistleblower matters, including trends and systemic issues, to strengthen organisational systems, culture and risk management.

9. POLICY REVIEW

This policy will be reviewed every three years, or sooner if required by changes in legislation, donor or regulatory requirements, significant breaches or incidents, audit findings, or FTS's operational needs.

Revision Log

Version	Date	Summary of Changes	Author
1	January 2026	Initial policy creation	Sarah Rogers, Country Director