

BRIDGIT WATER FOUNDATION WHISTLE-BLOWER POLICY

1. PURPOSE

This policy is founded upon BridgIT Water Foundation's commitment to accountability and transparency. The purpose of this policy is to provide a supportive work-relationship environment where misconduct within or by BridgIT Water Foundation can be raised without fear of retribution.

This is achieved by:

- Encouraging the reporting of serious misconduct
- Providing protected misconduct reporting alternatives to remove inhibitions that may impede such disclosures
- Establishing procedures that enable:
 - Protection for those that make serious misconduct disclosures
 - Independent internal inquiry/investigation of disclosures made
- Resolution of the issue(s) identified

2. APPLICATION

This policy applies to directors, employees, volunteers, contractors and consultants. It also applies to a person or organisation with a relationship with BridgIT Water Foundation who reports serious misconduct within or by a BridgIT Water Foundation employee/s.

3. DEFINITIONS

3.1 Definitions for this policy

Whistleblowing is:

The disclosure by or for a witness, of actual or suspected misconduct in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.

A Whistle-blower is: A person who reports serious misconduct in accordance with this policy

3.2 Descriptions of misconduct for this policy

Misconduct includes behaviour that:

- Is fraudulent or corrupt
- Is illegal

- Is unethical, such as acting dishonestly; altering company records; willfully making false entries in official records; engaging in questionable accounting practices; or willfully breaching BridgIT Water Foundation's code of conduct or the ACFID Code of Conduct
- Is potentially damaging to BridgIT Water Foundation, such as maladministration
- Is seriously harmful or potentially seriously harmful to a BridgIT Water Foundation employee or volunteer such as deliberate unsafe work practice or willful disregard to the safety of others in the workplace
- May cause serious financial or non-financial loss to BridgIT Water Foundation; or damage its reputation; or be otherwise seriously contrary to BridgIT Water Foundation's Whistle-blowing policy
- Involves any other kind of serious impropriety including retaliatory action against a whistle-blower for having made a wrongdoing disclosure

4. POLICY STATEMENT

BridgIT Water Foundation is committed to the highest standards of legal, ethical and moral behaviour. BridgIT Water Foundation recognises that people who have a working relationship with BridgIT Water Foundation are often the first to realise there may be concerns. However, for fear of appearing disloyal or concern about being victimised or the subject of other reprisals, they may be concerned about reporting this misconduct.

No person should be personally disadvantaged for reporting a wrongdoing. Not only may this misconduct be illegal, but it may directly oppose the values and mission of BridgIT Water Foundation.

BridgIT Water Foundation is committed to maintaining an environment where legitimate concerns are able to be reported without fear of retaliatory action or retribution.

When a person makes such a disclosure they are entitled to expect that:

- Their identity remains confidential at all times to the extent permitted by law or is practical in the circumstances
- They will be protected from reprisal, harassment or victimisation for making the report
- Should retaliation occur for having made the disclosure then BridgIT Water Foundation will treat it as serious wrongdoing under this Policy

5. PROCEDURES

5.1 All BridgIT Water Foundation staff will be made aware of this policy and their responsibilities to report wrongdoing to the Founding Director. It is the responsibility of the Founding Director to ensure all staff are adequately trained in understanding, identifying and (where possible) mitigating any activity that may breach the definitions of fraudulent or corrupt behaviour (as outlined in the Fraud Risk Management Policy & Anti-Terrorism Policy).

5.2 All BridgIT Water Foundation stakeholders will be notified of the Whistle-blower policy via the BridgIT Water Foundation website.

REPORTING PROCEDURES

5.3 A whistle-blower should report instances of, or suspicions of misconduct to Contact Point 1: the BridgIT Water Foundation Founding Director. Reports must be made in good-faith and be as thorough as is possible. False or malicious allegations may result in disciplinary actions. The Whistle-blower Report in Appendix A is the preferred format.

5.4 Where it is not possible or appropriate to report suspicion of misconduct to the Founding Director (Contact Point 1), reports should be raised directly to the Marketing Manager (Contact Point 2).

5.5 If the report is lodged with Contact Point 1, the officer will contact the Chairperson of the Board. Both parties will agree on the appointment of an appropriate delegate, who is not implicated in the report, to lead the investigation.

5.6 If the report is lodged with Contact Point 2, the officer will contact the Chairperson of the Board. Both parties will agree on the appointment of an appropriate delegate, who is not implicated in the report, to lead the investigation.

5.7 The individual who leads the investigation will be referred to as the Whistle-blower Protection Officer and should either a:

- qualified internal investigator who is independent of the area where the wrongdoing is alleged to have occurred, or
- qualified external investigator independent of BridgIT Water Foundation where considered necessary

5.8 The responsibilities of the appointed investigator include the assurance that action taken in response to the inquiry is appropriate to the circumstances and retaliatory action will not be taken against the person who made the disclosure.

5.9 Once the Whistle-blower Protection Officer is appointed, the Contact Point (if Contact Point 2) will notify the Founding Director the details and process of the investigation to be undertaken.

5.10 The investigator has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the relevant Contact Point, as may be required to satisfy the objectives of this Policy.

5.11 The Whistle-blower Protection Officer must keep the Contact Point regularly informed of the investigation progress.

5.12 The Whistle-blower Protection Officer is also responsible for keeping the Whistle-blower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom the allegations have been made.

5.13 The internal investigator must have internal independence of line management of the area affected by the wrongdoing disclosure. The internal investigator is authorised to apply the powers granted by the Board. The investigator may second the expertise of other officers in BridgIT Water Foundation to assist in the investigation and may seek the advice of internal or external experts as required.

5.14 Whistle-blower A person considering making a whistle-blower report is obliged to act in good faith and have reasonable grounds for believing the disclosure is reportable wrongdoing.

6. OBLIGATIONS

A Whistle-blower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Even though a whistle-blower may be implicated in the wrongdoing they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

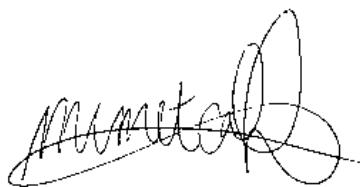
It is important to note that making a report may not protect the whistle-blower from the consequences flowing from involvement in the wrongdoing itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy. However active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary or other action.

Supporting Documents

BridgIT Water Foundation Fraud Risk Management Policy & Anti-Terrorism Policy

BridgIT Water Foundation Compliments and Complaints Policy

AUTHORISATION



Signature of Board Secretary

BridgIT Water Foundation

Date of approval by the Board: - 8th May 2018

Revised Document - Date of Board Approval – 22nd January 2019

Annex A – WHISTLE-BLOWER REPORT

Note: If you wish to remain anonymous, do not complete items 1-4 of this questionnaire.

<input type="checkbox"/> I authorize the use of the information provided in this report in accordance with the Whistleblower Policy	<input type="checkbox"/> I would like a summary of my concerns and proposed action to be provided to me.
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1. Please state your full name.	
2. Please state your position title and office location.	
3. What is your work telephone number and E-mail address?	
4. What is the name of your immediate manager?	
5. Please describe in detail the matter you would like to disclose.	
6. How was the matter discovered?	
7. Over what period of time has the suspected activity occurred?	
8. Why do you consider this matter to be a wrongful act?	
9. Please name all the people involved in the suspected wrongful act.	
10. Are there any witnesses? If yes, please state their names.	
11. Do you have any supporting evidence?	
12. Where is the evidence located?	
13. Is the evidence in danger of being lost or destroyed?	
14. Please explain how this evidence can be retrieved by the person involved in investigating the matter. Please provide evidence with your report.	
15. Have you been told about this matter by someone else?	
16. Who else knows about this matter?	
17. Please state (in detail) if you have any concerns regarding reprisals or recriminatory action taken or that might be taken against you.	
18. Please include any other details which you believe are relevant. This should include whether you have any personal interest in the matter.	