

Whistleblower Policy

Introduction

The Whistleblower Policy covers the process for dealing with reports/concerns raised by any person with regard to suspected/actual inappropriate conduct at Football Federation Victoria (FFV).

It also addresses the protection of individuals making those reports, without fear of reprisal or feeling threatened by doing so.

This policy aims to:

- encourage people to report an issue if they genuinely believe someone has contravened FFV's Code of Conduct, policies and/or the law;
- outline how FFV will deal with all reported misconduct or inappropriate behaviour; and
- assist in ensuring that serious misconduct or inappropriate behaviour is identified and dealt with appropriately.

Scope

This policy applies to all FFV employees, including full-time, part-time, casual and consultant.

Details

What is not Whistleblowing?

Whistleblowing is not about airing a grievance. It's about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary proceedings, including summary dismissal.

Who is a Whistleblower?

For the purposes of this policy a Whistleblower is a person employed or otherwise engaged by FFV who reports to FFV about behaviour by an FFV employee that amounts to inappropriate conduct whilst on official duty for FFV.

Official duty is defined as an employee carrying out their contractual duties as instructed by FFV.

What is improper conduct?

For the purpose of this policy, employees are encouraged to report any genuine matters or behaviours they believe contravene FFV's (i) codes and policies and/or (ii) the law while on official duty for FFV.

Matters may include any actual or suspected, whilst on official duty:

- conduct or practices that are illegal or breach any law;
- breach any of FFV's codes or policies;
- corrupt activities while on official duty;
- theft, fraud or misappropriation while on official duty;
- significant mismanagement or waste of FFV funds or resources;
- serious harm to public health, safety or environment or the health and safety of any FFV employee;
- any other conduct that is reasonably likely to cause loss to FFV, or otherwise that is reasonably likely to be detrimental to its interests; or
- any action taken against, or harm suffered by a FFV employee as a result on making a report under this policy.

Reporting Inappropriate Conduct

If you become aware of any matter or behaviour listed above, you should raise the issue immediately with your General Manager.

Where this is not appropriate or you do not feel comfortable in doing so, or where you have done so and previously no action has been taken, you should report the matter to the Human Resources Advisor (HRA) or the CEO.

Confidentiality

FFV will take all reasonable steps to protect the identity of the Whistleblower. Maintaining confidentiality is crucial in ensuring reprisals are not made against a Whistleblower. However it needs to be recognised that confidentiality may not be possible if the matter is to be properly investigated and responded to.

Whilst anonymous submissions/advices are not encouraged they will be accepted. A Whistleblower who reports incidents of corrupt or illegal conduct shall be protected from harassment or retaliation as a consequence of their disclosure. To affect this protection the HRA and the Legal Counsel shall maintain ongoing contact with the Whistleblower as circumstances warrant.

False reporting shall not attract any protection under this policy.

Procedure

All Whistleblower communications (either verbal or written) will be acknowledged as soon as possible. All reports received will be thoroughly investigated with the objective of locating evidence that substantiates or refutes the claims made by a Whistleblower. Best practice will be followed in these investigations to ensure it is fair and independent.

Investigations will be conducted without bias (actual or perceived) and any person against whom an allegation is made will be given the opportunity to respond. It may be the case that external professionals are engaged to assist in the investigation process.

FFV will take the necessary course of action in response to a report and if no action is taken, a detailed explanation will be provided to the Whistleblower.

The Whistleblower's identity and the contents of the report will be kept confidential and no details of participation in this process will be included in the Whistleblower's file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report or where required by law.

Communication

The Whistleblower will be kept informed of the outcomes of the investigation of his or her report, subject to privacy and confidentiality considerations. All Whistleblower's must maintain confidentiality and not disclose details of the report to any person.

Will a Whistleblower be penalised for reporting a matter?

A Whistleblower who reports a matter/s in good faith and provided he or she has not been involved in the conduct reported, will not be penalised or personally disadvantaged for so doing.

FFV will take reasonable steps to ensure that the Whistleblower does not suffer personal penalty or disadvantage from any person employed or engaged by FFV.

Any employee or manager who is found to have dismissed, demoted, harassed, or discriminated against a Whistleblower by reason of their status as a Whistleblower, may be subjected to disciplinary measures, including summary dismissal.

More information

Policies

- Code of Conduct
- Flow Chart (Attachment A)

For questions, contact:

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Attachment A – Whistleblower Flow Chart

