

## PROTECTED DISCLOSURE POLICY

Version number	1	Approved by Board on	22 Nov 2017
Responsible person	Executive Officer	Scheduled review date	Nov 2018

### VERSION CONTROL

VERSION No.	DATE	PERSON RESPONSIBLE	DETAILS
1	Nov 2017	K Holmes	Creation of policy

### REFERRING DOCUMENTS

- Code of Conduct
- Conflict of Interest Policy
- WHS Policy & Procedure Manual
- HR Procedure Manual

### PURPOSE

The Rural Financial Counselling Service Victoria - Gippsland (RFCSV-G) is committed to operating ethically and within relevant legislation; regulation and in accordance to its funding deed; policies and procedures.

The purpose of the Protected Disclosure Act 2012 (the Act), and this policy as required under the Act, is to encourage and facilitate the making of disclosures of improper conduct by RFCSV-G Board members, employees and contractors directly to the Independent Broad-based Anti-Corruption Commission (IBAC).

RFCSV-G's will ensure that employees or contractors reporting improper <sup>1</sup> conduct within RFCSV-G's operations will not be penalised in any way.

The purpose of this policy is to:

- encourage the reporting of matters that may cause harm to individuals, or cause financial and/or non-financial loss to RFCSV-G, or damage to its reputation;
- enable RFCSV-G to deal with reports from protected disclosures in a way that will protect the identity of the informant, and provide secure storage of the information provided;
- ensure the protection of informers against reprisal by any person internal or external to RFCSV-G;
- help to ensure RFCSV-G maintains the highest standards of ethical behaviour and integrity.

### SCOPE

This policy applies to all RFCSV-G Employees; Board members; Contractors; Clients and members of the public.

### LEGISLATION

*Protected Disclosure Act 2012 (Vic)*

<sup>1</sup> Improper conduct is defined as unethical, unlawful or non-compliant with policies and procedures.

## POLICY

RFCSV-G is committed to the aims and objectives of the Act. It recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures that reveal improper conduct that :

- may have taken place;
- still be occurring;
- is believed will occur or be engaged in; or
- 'detrimental action' taken (or suspected may be taken) in reprisal or in connection with a disclosure made.

RFCSV-G will not tolerate improper conduct by the organisation, its employees , contractors or Board members, and will protect those who come forward to disclose such conduct from any detrimental action.

RFCSV-G encourages any individual person (e.g., not organisation or company) to make a disclosure under the Act. The individual could be a person within RFCSV-G; client or member of the public.

RFCSV-G is not permitted to receive disclosures made under the Act.

Disclosures about RFCSV-G, its Board members, employees or contractors are to be made directly to IBAC to investigate the disclosure.

IBAC is not required to contact RFCSV-G about any disclosure made, nor must the disclosure be discussed with RFCSV-G or any person(s) in RFCSV-G unless permission is obtained by IBAC; or unless IBAC has directed to do so; or IBAC has contacted RFCSV-G for the provision of any necessary welfare and support for the informant.

RFCSV-G takes its obligations under the Act seriously. This includes the requirement to protect the identity of the discloser and the matters disclosed by a discloser. Maintaining confidentiality in relation to protected disclosure matters is crucial, among other things, in ensuring reprisals are not made against a discloser.

Disclosures may be made in a number of ways set out in the Act, including anonymously; in writing or orally. A discloser need not identify the person or body about whom the disclosure is made.

RFCSV-G acknowledges that it is a criminal offence under the Act to disclose any information connected with a disclosure made in accordance with the Act, including the identity of the discloser, unless directed by IBAC. The penalties for breaching confidentiality obligations include financial penalties and imprisonment.

RFCSV-G encourages everyone within the scope of this policy to visit [www.ibac.vic.gov.au](http://www.ibac.vic.gov.au) for further information; advice and support.