



**St Vincent de Paul Society**  
NSW  
*good works*

# **‘Speaking Up’ and Whistleblower Policy and Procedures**

**Approved by the St Vincent de Paul Society NSW Board on 14 February 2015**

## **Version Control**

<b>Contact names</b>	<b>Role/position</b>	<b>Version</b>	<b>Date</b>	<b>Review Date</b>
Fatma Onal	Resolution Project Officer	1	14 February 2015	15 February 2016

# Contents

<b>Purpose of Policy .....</b>	<b>3</b>
<b>Scope.....</b>	<b>3</b>
<i>Whistleblower Officer .....</i>	<i>4</i>
<i>Qualifying for whistleblower protection .....</i>	<i>4</i>
<i>The Australian Charities and Not-for-profits Commission (ACNC) Act 2012 .....</i>	<i>6</i>
<b>Definitions .....</b>	<b>7</b>
<b>Procedures.....</b>	<b>8</b>
1. <i>Making an allegation under this policy .....</i>	<i>8</i>
2. <i>Anonymity.....</i>	<i>8</i>
3. <i>Confidentiality.....</i>	<i>8</i>
4. <i>Handling allegations and protected disclosures.....</i>	<i>9</i>
5. <i>Reporting to the Audit, Risk and Finance Committee .....</i>	<i>9</i>
6. <i>Investigation .....</i>	<i>9</i>
7. <i>Protection from Reprisals .....</i>	<i>9</i>
8. <i>Integrity Hotline and website reporting .....</i>	<i>10</i>
9. <i>Investigation report .....</i>	<i>10</i>
10. <i>Disciplinary Action .....</i>	<i>10</i>
<b>Non compliance.....</b>	<b>11</b>
<b>Effectiveness and review .....</b>	<b>11</b>
<b>Further Advice or assistance .....</b>	<b>11</b>
<b>APPENDIX 1: ROLES AND RESPONSIBILITIES .....</b>	<b>12</b>

## Purpose of Policy

The St Vincent de Paul Society, NSW ('the Society'), as a public company limited by guarantee, is subject to the whistleblower protection provisions of Part 9.4AAA of the *Corporations Act 2001* (Cth.).

Under this policy, all members, volunteers and employees have a responsibility to promptly 'speak up' and make legitimate reports of actual or suspected wrongdoing which may cause damage or loss to the Society, whether financial or reputational.<sup>1</sup>

The purpose of this policy is to:

- encourage members, volunteers and employees to 'speak up' promptly and to make legitimate reports of actual or suspected wrongdoing that may cause financial or non-financial loss to the Society;
- provide members, volunteers and employees with a supportive work environment in which they feel able to raise issues of legitimate concern to them to the Society without fear of any recriminations or disadvantage;
- support a healthier and safer work environment through the reporting of inappropriate and unsafe work practices;
- enable the Society to deal with reports from whistleblowers in a way that will protect their identity; and
- provide an alternative means of reporting alleged or suspected wrongdoing where the usual reporting channels are considered inappropriate.

## Scope

The Society is committed to high levels of professional and ethical behaviour in the workplace. All members, volunteers and employees have a duty to promptly report suspected or actual allegations of wrongdoing as part of their day-to-day responsibilities working for the Society.

This policy complements rather than displaces reporting arrangements for workplace grievances, discrimination, harassment, bullying or managing fraud and dishonest behaviour as well as normal communication channels between individuals, managers and supervisors to address questions, concerns, suggestions and complaints. If an individual has any

---

<sup>1</sup> In accordance with this policy and the its *Code of Conduct for Members, Volunteers and Employees* the Society requires all employees, members and volunteers to 'speak up' about actual or suspected wrongdoing within the Society. However, whistleblower protection under the *Corporations Act 2001* and *ASIC Act* may not apply to volunteers and members. While this policy outlines that employees, members and volunteers of the Society will not have reprisal action taken against them by the Society when or after reporting actual or suspected acts of wrongdoing within the Society, the Society cannot guarantee that volunteers and members will receive whistleblower protection if a matter were to proceed in a legal forum or be raised against the volunteer or member by a third party (that is, not the Society). This policy also does not cover former employees of the Society as whistleblower protection does not extend to former officers, employees or contractors or employees of contractors. See this policy under the section "Qualifying for whistleblower protection" for more information.

concern(s) about what is proper conduct in a particular situation, they should first consider consulting the *Code of Conduct for Members, Volunteers and Employees* (“Code of Conduct”) and other related policies.

### ***Whistleblower Officer***<sup>2</sup>

The role of the Whistleblower Officer is to safeguard the interests of the whistleblower and any supporting witnesses in this policy. The Whistleblower Officer has direct, unfettered access to independent financial and legal advisors and a direct line of reporting to the NSW State President, the Chief Executive Officer (CEO), the Chair of the Society’s Audit, Risk and Finance Committee, Central Council Presidents and Executive Officers as required.

The Whistleblower Officer is responsible for receiving and appointing an Investigator to inquire into any allegation report received through any of the different ways listed in this policy. Where an allegation might involve the Central Council President, or the NSW State President, or an Executive Officer or the CEO, the Whistleblower Officer must raise the matter with the Deputy Chief Executive Officer (DCEO), or if it involves the DCEO, with the CEO to determine how and by whom the complaint will be investigated.<sup>3</sup>

Once an Investigator is appointed the investigation should be completed and a report submitted to the Whistleblower Officer within a period of 30 days from the date the allegation was received. The Whistleblower Officer is responsible for keeping the whistleblower informed of the outcomes of the inquiry or investigation subject to certain considerations – such as the privacy of those against whom the allegations have been made.

### ***Qualifying for whistleblower protection***

#### *Part A*

Under the *Corporations Act*<sup>4</sup>, a person can apply for whistleblower protection if they are:

- an officer<sup>5</sup> of the Society; or
- employee of the Society; or
- a contractor or their employee who has a contract to supply goods or services to the Society.

The *Corporations Act* restricts retaliation against a whistleblower. It provides qualified privilege against defamation and precludes contractual or other remedies being enforced,

---

<sup>2</sup> For further information on ‘roles and responsibilities’ refer to Appendix 1.

<sup>3</sup> Should the Whistleblower Officer be unavailable or absent on leave, the alternative contact person will be the Society’s Chief Financial Officer.

<sup>4</sup> Also see *Corporations Act 2001* – SECT 1317AA in Part 9.4AA:  
[http://www.austlii.edu.au/au/legis/cth/consol\\_act/ca2001172/s1317aa.html](http://www.austlii.edu.au/au/legis/cth/consol_act/ca2001172/s1317aa.html)

<sup>5</sup> An officer of the Society can be a director or secretary. See *Australian Securities and Investment Commission* (ASIC) for more information: <http://www.asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/whistleblowers-and-whistleblower-protection/>

including civil and criminal liability, for making the disclosure. Thus, any secrecy provisions in employment contracts will not preclude whistleblowing.

However, reporting misconduct that you have participated in will not give you immunity from liability for that misconduct. You may still be liable for any misconduct you took part in, regardless of whether you later report it as a whistleblower.

#### *Part B*

In order to qualify for protection, the whistleblower's disclosure must be made to one of the following agencies or individuals:

- ASIC<sup>6</sup>; or
- the Society's Auditor or a member of its audit team; or
- a Director or the Company Secretary<sup>7</sup>; or
- a senior manager; or
- another person authorised by the Society to receive disclosures of this kind (i.e. the Whistleblower Officer<sup>8</sup>).

#### *Part C*

Furthermore, in order to trigger the provisions of the *Corporations Act*, the whistleblower must:

- provide their name before making the disclosure;
- have reasonable grounds to suspect that their revelation indicates the Society, or a Society employee, has or may have contravened the *Corporations Act* or the *Australian Securities and Investments Commission Act 2001 (Cth.) (ASIC Act)*<sup>9</sup>; and
- act in good faith.<sup>10</sup>

#### *Part D*

Where a whistleblower makes a disclosure under the *Corporations Act*, the disclosure and the identity of the whistleblower (or information leading to the identity of the whistleblower) can be passed to:

- ASIC or the Australian Federal Police (AFP) without requesting the whistleblower's permission; or
- a third party other than the aforementioned, but only if the whistleblower provides their consent.

---

<sup>6</sup> See *Australian Securities and Investment Commission* (ASIC): [www.asic.gov.au](http://www.asic.gov.au)

<sup>7</sup> Refer to footnote "3".

<sup>8</sup> Contact [Whistleblower.Officer@vinnies.org.au](mailto:Whistleblower.Officer@vinnies.org.au)

<sup>9</sup> See "Who is a whistleblower?" on ASIC's website for more information: <http://www.asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/whistleblowers-and-whistleblower-protection/>

<sup>10</sup> Where a person has a malicious or secondary purpose in making a disclosure, the good faith requirement is considered not to have been met.

Therefore, the reported disclosure cannot be passed on to members of the Board or the Chief Executive Officer (CEO) without the prior consent of the whistleblower.<sup>11</sup>

### ***The Australian Charities and Not-for-profits Commission (ACNC) Act 2012***

There is no specific protection for whistleblowers under the *Australian Charities and Not-for-profits Commission Act 2012* (Cth.). The ACNC cannot act on concerns about internal disputes at charities. It is possible, however, to raise a concern about a charity with the ACNC, in respect of the following:

- losing a significant amount of money or assets without a reason;
- harming the people who benefit from the charity;
- set up for illegal or improper purposes, such as being a 'sham' charity;
- being used for the private benefit of members;
- being misgoverned or mismanaged in a way that puts it at serious risk
- being involved in criminal activities; and
- posing a threat to national security such as funding or engaging in terrorist activities or otherwise breaching the *ACNC Act* or acting in a way that threatens public trust and confidence in the charity and the sector more broadly.

The ACNC does not deal with complaints outside of its responsibilities, concerning matters such as:

- fundraising;
- internal disputes, such as disagreements within a charity, that are not a serious risk or do not breach the *ACNC Act*;
- contracts a charity has with other organisations (other government departments and agencies often look at this issue);
- the services a charity provides;
- policies or actions of Boards or Directors that are within their powers; or
- employment issues such as unfair dismissal.

Generally, the ACNC will only act on concerns where there is a serious risk to public trust and confidence in the sector and these concerns relate to a charity's compliance with requirements of the *ACNC Act*.<sup>12</sup>

---

<sup>11</sup> See "Whistleblowers-company officeholder obligations," on ASIC's website for more information: <http://asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/>

<sup>12</sup> Further information can be found on the website of the *Australian Charities and Not-for-Profits Commission* (ACNC): [http://www.acnc.gov.au/ACNC/Contact-us/Raise-Concern/ACNC/Adv/Raise\\_Concern.aspx](http://www.acnc.gov.au/ACNC/Contact-us/Raise-Concern/ACNC/Adv/Raise_Concern.aspx).

## Definitions

**Associate Member:** Associate members generally assist and support conference members and perform unpaid work for the Society. They are not full members and do not attend Conference meetings. Associate Members are established by a procedure established by St Vincent de Paul Society NSW Board.

**Conference Member-** Conference members are those who are desirous of living their Catholic faith, or are committed to the ethos, mission, aims, and objects of the Society, and who seek to live out their faith and commitment in action through the spirit of Christian charity. Conference members belong to a Conference.

**Employee:** An employee is a person who is hired to provide services in exchange for compensation – pay or salary. (Australian Taxation Office, 2012). An employee is a paid member of staff. The Rule (Part III, 2012, Article 26) describes the role of employees in a way that clearly refers to paid persons as “employees”. This includes contractors providing services to the Society for a set time or specific task and those engaged in the performance of duties for the Society from a labour hire agency.

**Integrity Hotline and website reporting:** This is a confidential telephone line (1300 304 550) and email facility ([vinniesnsw@stopline.com.au](mailto:vinniesnsw@stopline.com.au)) managed and staffed by an independent third party for anyone to call between the hours of 6.00pm and 8.00pm (Monday to Friday) for advice and for making legitimate allegations of wrongdoing, either anonymously or not, for investigation.

**Investigator:** An Investigator is any suitably skilled employee of the Society with the assistance of the Internal Audit and Risk Manager or a third party engaged externally by the Society who is tasked with undertaking the investigation in this policy.

**Member:** The term member includes conference, associate and volunteer members.

**Volunteer:** A volunteer is a person such as a student, intern, corporate and others who perform unpaid work for the Society such as through various schemes including “work for the dole” and “community service order” schemes. In this document “volunteer” does not include “members”.

**Volunteer member:** This is a person who respects the ethos, mission, aims, and objectives of the Society and who volunteers in any of the Society’s works. Volunteer members are registered by a procedure established by the State Council.

## Procedures

The following procedures describe how this policy is to operate in the Society.

### **1. Making an allegation under this policy**

An allegation under this policy can be made in the following ways:

- by phoning the Integrity Hotline; or
- making an online report through the Integrity website<sup>13</sup>; or
- by contacting the Society's Whistleblower Officer; or
- by contacting the individual's manager or supervisor who must immediately forward the allegation to the Whistleblower Officer.

### **2. Anonymity**

Whistleblower disclosure protections under the *Corporations Act* are not available for anonymous allegations. However, if an individual wants to make an anonymous complaint they should refer to the Society's *Complaint Handling Policy and Procedures* document.

### **3. Confidentiality**

Allegations of actual or suspected wrongdoing in this policy will be treated confidentially, with full details only known by the Whistleblower Officer and the person who undertakes the investigation.<sup>14</sup>

Protected disclosure allegations must be kept confidential as far as possible, subject to the need to meet legal and regulatory requirements (e.g. if the matter is of a criminal nature and is referred to the Police). Disclosures which involve illegal acts, violence or physical abuse of any kind do not allow for complete anonymity. In these cases, if the identity of the whistleblower needs to be disclosed, the Whistleblower Officer should where possible discuss this with the whistleblower beforehand.<sup>15</sup>

Subject to any legal requirements, all individuals including the whistleblower, must protect and maintain the confidentiality of protected disclosures including the identity of people they know or suspect may have made the disclosure or who are the subject of the

---

<sup>13</sup> [www.stopline.com.au](http://www.stopline.com.au)

<sup>14</sup> The Investigator will be given full details only if the whistleblower has provided their consent. See again, <http://asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/>

<sup>15</sup> In relation to "immunities" and "protections" "If you fall within the specific statutory definition of a whistleblower, you are also entitled to certain immunities and protections under the *Corporations Act 2001* (Corporations Act), but you should seek separate legal advice about that. If you are concerned about protection and are unsure if the law can protect you, we recommend that you seek your own advice from a lawyer." This passage has been taken directly from ASIC's website. See ASIC for more information: <http://www.asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/whistleblowers-and-whistleblower-protection/>

allegation. All individuals are reminded of their obligation to treat as confidential any information obtained during the course of their work. Failure to maintain confidentiality is a serious matter and may be subject to disciplinary action within the Society.

#### **4. *Handling allegations and protected disclosures***

The Whistleblower Officer will acknowledge receipt of the protected disclosure allegation.

The Whistleblower Officer will pass the allegation to a suitably qualified Investigator to undertake the investigation once the whistleblower has provided their consent. All protected disclosures will be investigated in a timely manner and appropriate corrective action taken as warranted by the investigation. The whistleblower will be kept appropriately informed of the progress of actions taken in respect of the allegation made.

#### **5. *Reporting to the Audit, Risk and Finance Committee***

The Chief Financial Officer will provide a report to the Audit, Risk and Finance Committee summarising the protected disclosures received at least once a year around August or more frequently as required, protecting confidentiality, anonymity and any information which might make possible the identification of the whistleblower in any way.

#### **6. *Investigation***

The investigation should seek to clarify and gain an understanding of the facts and to seek any new information which might not have already been uncovered. The investigation should ensure the application of natural justice and procedural fairness.

The investigation should include interviews as necessary including those with individuals who might have been included in the initial investigation for clarification or additional information. A formal interview should also be held with the individual suspected of wrongdoing. The investigation report should be completed and submitted to the Whistleblower Officer by the Investigator within 30 days of the allegation being acknowledged by the Whistleblower Officer.

#### **7. *Protection from Reprisals***

The Society is committed to protecting and respecting the rights of the individual who reports wrongdoing in good faith. The Society will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a report of wrongdoing, or against the person's colleagues, employer (if a contractor) or relatives. For example the person must not be disadvantaged or victimised by:

- dismissal;
- demotion;
- any form of intimidation or harassment;
- discrimination;
- current or future bias;

- action causing injury, loss or damage; or
- threats (express, implied, conditional or unconditional) to cause detriment as well as actually causing detriment.

If the individual believes that any retaliatory action has been taken against them they can report the matter immediately to the Chief Financial Officer (if they are a volunteer or an employee) or to the NSW State President (if they are a member). However, ASIC recommends that whistleblowers seek legal advice should they feel victimised or are subject to litigation.<sup>16</sup>

### **8. Integrity Hotline and website reporting**

The Society has engaged an independent third party to manage a confidential Integrity Hotline to provide advice and to receive reported allegations of actual or suspected wrongdoing from members of the public or anyone working at the Society concerning any Society-related matter.

A separate Integrity website ([www.stopline.com.au](http://www.stopline.com.au)) managed by the same entity is also available for those who prefer to make a wrongdoing allegation online. A report will be submitted to the Society's Whistleblower Officer within one business day for each phone call and online allegation received. For more information see the Fact Sheet which is available both on the internet and Vintranet.<sup>17</sup>

### **9. Investigation report**

Once the investigation is complete a report should be finalised by the Investigator which is then presented to the Whistleblower Officer. This report should detail the findings, conclusions and recommendations from the investigation and include recommendations for approval.

The investigation report should be completed within a period of a month from when the allegation was first received. When the report is received, the Whistleblower Officer should:

- review the report and recommendations;
- endorse the report and recommendations and/or make comments;
- submit a copy of the report to the Chief Financial Officer and DCEO, or CEO if it is not appropriate to include the DCEO, for consideration of next appropriate actions; and
- forward a copy to the to the Head of Workplace Relations if any disciplinary action is being recommended for an employee.

### **10. Disciplinary Action**

The Chief Financial Officer and the DCEO (or CEO if it is not appropriate to include the DCEO) will decide what action may be taken once the investigation has concluded.

<sup>16</sup> See ASIC: <http://www.asic.gov.au/for-business/running-a-company/company-officeholder-duties/whistleblowers-company-officeholder-obligations/whistleblowers-and-whistleblower-protection/>

<sup>17</sup> Vintranet is the Society's own intranet not accessible to the public.

## Non compliance

Any person who takes any reprisal action against anyone who has made a legitimate report of an actual or suspected wrongdoing may be subject to disciplinary action. Failure to make a legitimate report of an actual or suspected wrongdoing may, depending on the circumstances, be subject to disciplinary action.

## Effectiveness and review

After two years from the date of the policy's implementation the effectiveness of this policy will be reviewed by the Chief Financial Officer who will report the outcome of the review to the Audit, Risk and Finance Committee.

## Further Advice or assistance

Contact ASIC:

- phone the Customer Contact Centre on:
  - 1300 300 630 (within Australia);
  - + 61 3 5177 3988 (from outside Australia).
- Postal address

GPO Box 9827  
Sydney NSW 2001  
DX 653 Sydney

Contact the Society's Whistleblower Officer:

- Phone 02 9568 0262
- Email [Whistleblower.Officer@vinnies.org.au](mailto:Whistleblower.Officer@vinnies.org.au)
- Postal address

PO Box 5  
Petersham NSW 2049

## APPENDIX 1: ROLES AND RESPONSIBILITIES

Roles	Responsibilities
<b>NSW State President and Chief Executive Officer</b>	Promotion of a culture: <ul style="list-style-type: none"> <li>• that encourages and supports ethical workplace practices and encourages individuals to ‘speak up’ and report actual or suspected wrongdoing;</li> <li>• that protects those who make such legitimate reports; and</li> <li>• where discrimination against those who make such reports is not tolerated.</li> </ul>
<b>NSW State President</b>	Receive allegations from individuals (members) who feel they are being victimised as a result of an allegation that has been made under this policy.
<b>Chief Executive Officer</b>	Appoint an individual to be the Whistleblower Officer under this policy for the whole Society.
<b>St Vincent de Paul Society NSW Board</b>	Monitor the performance of the effectiveness of the whistleblower reporting and protection arrangements.
<b>Governance Committee</b>	Provide assurance to the St Vincent de Paul NSW Board of the appropriateness of the Society’s whistleblower reporting and protection arrangements.
<b>Audit, Risk and Finance Committee</b>	Responsible for overseeing the effectiveness of the Society’s whistleblower arrangements.
<b>Chief Financial Officer and Company Secretary</b>	<ul style="list-style-type: none"> <li>• Provide assurance to the Audit, Risk and Finance Committee that the Society has appropriate whistleblower arrangements in place and that these are operating effectively;</li> <li>• Facilitate the reporting of criminal offences to the police in consultation with the NSW State President and Chief Executive Officer (in respect of members, volunteers and employees);</li> <li>• Receive allegations from individuals (volunteers and employees) who feel they are being victimised as a result of an allegation that has been made under this policy;</li> <li>• Review the effectiveness of this policy at least every two years and present a report on the effectiveness of the policy and any protected disclosures made each August to the Audit, Risk and Finance Committee; and</li> <li>• Liaise with the Australian Charities not-for-profit Commission with respect to fraud allegations as</li> </ul>

	detailed in <i>'Protect your charity from fraud' 2013.</i>
<b>Whistleblower Officer</b>	<ul style="list-style-type: none"> <li>• To receive protected disclosures under this Policy and Procedures and acknowledge receipt of each allegation;</li> <li>• Ensure that the investigation into the allegation received is concluded within 30 days of receipt;</li> <li>• To provide advice and support to whistleblowers with respect to making a protected disclosure allegation under this policy;</li> <li>• To safeguard the interests of the whistleblower and any supporting witnesses while the allegation is under investigation, as well as after the conclusion of the investigation and any resultant action has been concluded;</li> <li>• Receive reports of allegations from a number of sources including the third party managing the Integrity Hotline and website online reporting tool;</li> <li>• To appoint an Investigator to inquire into any allegations received;</li> <li>• Consider reports and recommendations from Investigators and to refer these to the Chief Financial Officer for determination;</li> <li>• Ensuring that any individual making a protected disclosure allegation is protected from any detrimental action in accordance with the Society's Whistleblower Policy;</li> <li>• To keep the whistleblower informed of progress for the investigation of the allegation they have submitted and advise if the allegation is expected to take longer than 30 days to be completed; and</li> <li>• To inform the whistleblower of the outcome of the investigation.</li> </ul>
<b>Central Council &amp; SSO Executive Officers, Managers and Supervisors</b>	<ul style="list-style-type: none"> <li>• Promote a workplace culture which encourages individuals to 'speak up' and report actual or suspected wrongdoing, protects those who make such legitimate reports and where discrimination against those who make such reports is not tolerated;</li> <li>• Accountable for own actions or omissions and those of their staff;</li> <li>• Treat seriously all reports of alleged wrongdoing received and ensure these are forwarded confidentially to the Society's Whistleblower Officer for whistleblower protection and investigation ; and</li> <li>• Co-operate with any investigation into an allegation of a suspected or actual wrongdoing.</li> </ul>

<b>Investigator</b>	<ul style="list-style-type: none"> <li>• To undertake an investigation at the request of the Whistleblower Officer;</li> <li>• To present a report and recommendations on a protected disclosure allegation to the Whistleblower Officer within a month of the allegation being received by the Society; and</li> <li>• To keep the Whistleblower Officer informed of the progress of any investigations being undertaken.</li> </ul>
<b>Integrity Hotline and website reporting tool</b>	<ul style="list-style-type: none"> <li>• Third party provider who provides advice and a means of making reports by callers to its confidential telephone line 1300 304 550 of actual or suspected wrongdoing or via its website online reporting facility; and</li> <li>• Reports allegations received to the Whistleblower Officer for consideration and investigation.</li> </ul>
<b>All Members, Volunteers and Employees</b>	<ul style="list-style-type: none"> <li>• Should 'Speak up' and immediately report actual or suspected allegations of wrongdoing by anyone working for the Society;</li> <li>• Accountable for own actions or omissions;</li> <li>• Co-operate with any investigation into an allegation of a suspected or actual wrongdoing;</li> <li>• Subject to any legal requirements, all individuals including the whistleblower, must protect and maintain the confidentiality surrounding protected disclosures including the identity of people they know or suspect may have made the disclosure or who are the subject of the allegation;</li> <li>• Must not engage in, participate in, cover up or in any way assist in, including by failing to act any form of wrongdoing which damages the Society, its reputation, personnel or financially in any way;</li> <li>• Be vigilant at all times to prevent and detect wrongdoing in own work area;</li> <li>• Behave in a lawful manner and comply with relevant legislative and Society policies and procedures; and</li> <li>• Act within the delegated authority of the role being undertaken in the Society</li> </ul>