

## Critical Points

1. Stroke Foundation encourages reports of Wrongdoing.
2. Reports of Wrongdoing can be made internally or anonymously via an engaged third party Disclosure Service as the first contact point at;  
<https://strokefoundation.stoplinereport.com>
3. Stroke Foundation is committed to ensuring legitimate concerns can be raised without fear of retaliation, retribution, or personal disadvantage.
4. The Whistleblower Governance Officers for Stroke Foundation are: the Executive Director, Corporate Services, the National Manager People and Culture, the Chair of the Governance and Nominations Committee (Board sub-committee) and the Chair of the Finance, Investment and Risk Committee (Board sub-committee).
5. Stroke Foundation will ensure that the identity of any person making a disclosure of Wrongdoing will remain confidential to the extent permitted by law.

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### 1. Purpose

The purpose of this policy is to provide a supportive environment within Stroke Foundation where perceived Wrongdoing can be raised safely and without fear of retaliation, retribution, or personal disadvantage.

This policy is one of a suite of policies that promote a culture of honesty, ethical behaviour, and compliance at Stroke Foundation.

## 2. Scope

This policy applies to Stroke Foundation Governance Members, Workforce Members, Contractors and Consultants, past and present as well as their relatives. It also applies to a person or organisation who has a relationship with Stroke Foundation and who reports a Wrongdoing within or by Stroke Foundation.

This policy may be reviewed, varied, added to, or withdrawn by Stroke Foundation at any time at its discretion.

## 3. Definitions

Term	Description
Consultants	Third party individuals and organisations engaged by Stroke Foundation to provide advice and professional services.
Contractors	Third party individuals and organisations with whom Stroke Foundation has a contractual relationship to deliver agreed services to Stroke Foundation.
Employees	Persons who work for Stroke Foundation in a full-time, part-time, fixed term or casual capacity as determined by their employment agreement.
External Managed Disclosure Service (Disclosure Service)	<p>Stroke Foundation has engaged an independent external entity to allow anonymous complaints to be lodged if the Whistleblower so desires. To lodge a complaint with the Disclosure Service you can use the following avenues;</p> <p>Email: <a href="mailto:makeareport@stopline.com.au">makeareport@stopline.com.au</a></p> <p>Telephone: 1300 30 45 50</p> <p>Website: <a href="https://strokefoundation.stoplinereport.com">https://strokefoundation.stoplinereport.com</a></p> <p>Smart APP: stopline365</p> <p>Mail: Stroke Foundation, PO Box 403, Diamond Creek, VIC 3089</p>
Governance Members	Persons appointed to Stroke Foundation's Board and Board subcommittees.
Investigator	In accordance with <a href="#">PC005 PO: Internal Complaints &amp; Disputes</a> and <a href="#">PC005 PR: Internal Complaints Handling Procedure</a> , an experienced individual who is appointed by a Whistleblower Governance Officer to investigate a reported Wrongdoing. The Investigator will be independent from the division or business area of Stroke Foundation concerned, the Whistleblower and any person who is a subject of the Wrongdoing report.
Retaliation	Reprisal, harassment and/or victimisation.
Volunteers	Persons who give their time willingly to perform a specific role within Stroke Foundation without financial gain. Voluntary roles include office and community-based roles, as well as those of Governance Members within Stroke Foundation's Board and Board subcommittees.
Whistleblower	A person who reports Wrongdoing in accordance with this policy.
Whistleblower Governance Officers	<p>A person to whom a report of Wrongdoing under this policy is made.</p> <p>For Stroke Foundation these officers are:</p> <ul style="list-style-type: none"><li>› Executive Director Corporate Services</li><li>› National Manager People and Culture.</li></ul> <p>If the report to the independent Disclosure Service contains allegations against any Executive Member including either of these Governance Officers, the Whistleblower Governance Officers are:</p>

	<ul style="list-style-type: none"> <li>› Chair of the Governance and Nominations Committee (Board subcommittee).</li> <li>› Chair of the Audit, Finance, Investment and Risk Committee (Board subcommittee).</li> </ul>
Whistleblowing	The disclosure by or for a witness, of actual or suspected Wrongdoing in an organisation. In Victoria, Whistleblowing is referred to as “Protected Disclosure” and is referred to collectively by the word “Whistleblowing”.
Workforce Members	Stroke Foundation Workforce Members are Employees and Volunteers, as defined in this table. They are collectively referred to as Workforce Members, unless specifically referenced.
Wrongdoing	<p>Wrongdoing includes conduct that:</p> <ul style="list-style-type: none"> <li>› Is fraudulent or corrupt.</li> <li>› Is illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of State, Federal or Territory legislation.</li> <li>› Is unethical, such as acting dishonestly; altering Stroke Foundation records; wilfully making false entries in the books and records; engaging in questionable accounting practices; or wilfully breaching Stroke Foundation values.</li> <li>› Is potentially damaging to Stroke Foundation such as maladministration or substantial waste of resources.</li> <li>› Is harmful or potentially harmful to a person such as deliberate unsafe work practices or wilful disregard to the safety of others in the workplace.</li> <li>› May cause financial or non-financial loss to Stroke Foundation; or damage its reputation; or be otherwise contrary to Stroke Foundation’s interests.</li> </ul> <p>Involves any other kind of impropriety including Retaliation against a Whistleblower for having made a disclosure of suspected Wrongdoing.</p> <p>Personal work related grievances are not captured as Wrongdoing for the purpose of this policy and Workforce members are encouraged to consider <a href="#">PC005 PO: Internal Complaints &amp; Disputes</a> and associated <a href="#">PC005 PR: Internal Complaints Handling Procedure</a> as well as the reporting avenues in this policy.</p>

## 4. Responsibilities

### 4.1. Whistleblower Governance Officer(s)

A Whistleblower Governance Officer is responsible for:

- › Assessing all disclosures of Wrongdoing referred to him/her by the Disclosure Service to ascertain if they contain enough information to form a reasonable basis for investigation.
- › Conducting sufficient inquiry into all disclosures of Wrongdoing with the objective of gathering evidence relating to the claims made. That evidence may substantiate or refute the claims made.
- › If appropriate, appointing an independent investigator, either internal or external to Stroke Foundation to investigate disclosures of Wrongdoing.
- › Where appropriate, ensuring action is taken in response to the investigation findings in accordance with this policy.
- › Taking steps to ensure the Whistleblower is protected from Retaliation.
- › Maintaining appropriate confidentiality and privacy of the Whistleblower and process.

- › Notifying Wrongdoing disclosures in broad terms to the Chief Executive Officer and President, except if either party is implicated in the Wrongdoing, in which case they will be informed in due course as part of the investigation.

The Whistleblower Governance Officers have direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the Chief Executive Officer or the Board, as may be required to satisfy the objectives of this policy.

#### 4.2. **Workforce Members**

Workforce Members are responsible for reading, understanding, and adhering to this policy.

#### 4.3. **The Board and Executive**

The Board and Executive Management Team are responsible for:

- › Ensuring this policy is reviewed and updated in accordance with legislative requirements.
- › Ensuring the process for making a Whistleblowing complaint is communicated to all Workforce Members.
- › Implementing training in how to make a report under this policy to all Workforce Members.

#### 4.4. **The Investigator**

The Investigator is responsible for:

- › Investigating the reported Wrongdoing on behalf of the Whistleblower Governance Officer (this responsibility may be assumed by the Whistleblower Governance Officer themselves).
- › Conducting the investigation in a fair and independent manner, maintaining appropriate confidentiality, privacy of the Whistleblower and process.
- › Providing a report to the Whistleblower Governance Officer on the outcomes of the investigation.

#### 4.5. **The Whistleblower**

The Whistleblower is responsible for:

- › Having reasonable grounds for believing the disclosure is reportable Wrongdoing, as defined in this policy.
- › Providing information to assist any inquiry/investigation of the Wrongdoing disclosed.

Even though a Whistleblower 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.

## 5. **Reporting Wrongdoing**

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#### 5.1. **Whistleblowing reporting**

Stroke Foundation encourages the reporting of all suspected Wrongdoing.

In determining the best avenue for reporting suspected Wrongdoing, Workforce Members are encouraged to first consider [PC005 PO: Internal Complaints & Disputes](#) and associated [PC005 PR: Internal Complaints Handling Procedure](#) as well as all reporting avenues in this policy.

Whistleblowers are encouraged to:

- › contact a Whistleblower Governance Officer to obtain additional information about reporting before making a disclosure; and
- › report suspected Wrongdoing internally either to Stroke Foundation line management or to a Whistleblower Governance Officer in the first instance.

Stroke Foundation has engaged an independent external Disclosure Service for circumstances where:

- › [PC005 PO: Internal Complaints & Disputes](#) and associated [PC005 PR: Internal Complaints Handling Procedure](#) reporting channel is considered inappropriate for the suspected Wrongdoing; or

- › Stroke Foundation line management or a Whistleblower Governance Officer was notified but failed to deal with the notification of suspected Wrongdoing; or
- › The person or organisation disclosing the suspected Wrongdoing is concerned about possible Retaliation and wishes the report to be anonymous.

The channels for making a Whistleblowing complaint to the Disclosure Service are;

Contact	Details
Email	<a href="mailto:makeareport@stopline.com.au">makeareport@stopline.com.au</a>
Telephone	1300 30 45 50
Website	<a href="https://strokefoundation.stoplinereport.com">https://strokefoundation.stoplinereport.com</a>
Smart APP	stopline365
Mail	Stroke Foundation, PO Box 403, Diamond Creek, VIC 3089

## 5.2. Anonymous reporting

Although anonymous reports of Wrongdoing are accepted under this policy to the Disclosure Service. Anonymous reports have significant limitations that may inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback and to gather additional details to assist the inquiry/investigation. Specific protection mechanisms cannot be provided.

## 6. Investigation of Wrongdoing process

An investigation of suspected Wrongdoing will be conducted in a confidential, fair and objective manner. The investigation process will vary depending on the nature of the Wrongdoing and the amount of information provided. For a report to be investigated, it must contain enough information to form a reasonable basis for investigation.

The investigation will not be conducted by a person who may be the subject of the investigation or has significant links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

The investigation process will be in line with [PC005 PO: Internal Complaints & Disputes](#).

Primary contacts for any investigation conducted under this policy will be the Stroke Foundation delegated Whistleblower Governance Officers, and Executive Director, Corporate Services

## 7. Other Complaint Mechanisms

This policy is in addition to:

- › The [PC005 PO: Internal Complaints & Disputes](#), which is available to all Workforce Members and Contractors engaged as part of Stroke Foundation's workforce, to raise any matters they may have in relation to their work or their work environment, other persons, or decisions affecting their employment.
- › The [OP003 PO: Feedback and Complaints](#) form available to members of the public to raise concerns or provide feedback to Stroke Foundation.
- › This policy does not replace other reporting structures outlined in other various Stroke Foundation policies and procedures (refer [section 11](#)).
- › The exercising of rights under the terms of their contract by Contractors and suppliers.

## 8. Confidentiality and protection of Whistleblower identity and reports

8.1. This will be maintained in accordance with the [ASIC Regulatory Guide 270 Whistleblower Policies](#). The following protections apply:

- a. identity protection (confidentiality) (see RG 270.90–RG 270.94);

- b. protection from detrimental acts or omissions (see RG 270.95– RG 270.101);
  - a. compensation and other remedies (see RG 270.102–RG 270.103); and
  - c. civil, criminal and administrative liability protection (see RG 270.104– RG 270.105)
- 8.2. This policy also notes that the ASIC protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.
- 8.3. If a person or organisation makes a report of alleged or suspected Wrongdoing under this policy, Stroke Foundation will endeavour to protect that person's or organisation's identity and will not disclose the person's or organisation's identity unless the:
  - › Person or organisation making the report consents to the disclosure;
  - › Disclosure is required or authorised by law; and/or
  - › Disclosure is necessary to further investigation.
- 8.4. Stroke Foundation will also take reasonable precautions to securely store any records relating to a report of a Wrongdoing and to restrict access to authorised persons only.
- 8.5. Unauthorised disclosure by Stroke Foundation personnel of information relating to a report, the identity of a Whistleblower or information from which the identity of a Whistleblower can be inferred may result in disciplinary action. This may include termination of employment or contract.
- 8.6. A guide to Whistleblower protections in the Corporations Act:
  - › <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/guidance-for-whistleblowers/>
- 8.7. **Retaliation**

Stroke Foundation is committed to protecting and respecting the rights of a person or organisation that reports Wrongdoing in accordance with this policy. Stroke Foundation will not tolerate any Retaliation or threats of Retaliation against any person or organisation that has made or is believed to have made a report of Wrongdoing in accordance with this policy. Stroke Foundation will also not tolerate any Retaliation or threats of Retaliation against that person's colleagues, employer (if a Contractor or supplier) or relatives.

Any such Retaliation for a report being made under this policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

## 9. Management of a person against whom a report is made

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Stroke Foundation recognises that individuals against whom a report is made must also be supported during the handling and investigation of the suspected Wrongdoing report. Stroke Foundation will take steps to treat fairly the person who is the subject of a report, including providing such individual with a right of response.

## 10. Breach

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Any breach of this policy will result in disciplinary action which may include dismissal.

## 11. Related Policies

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- › [PC005 PO: Internal Complaints & Disputes](#)
- › [PC005 PR: Internal Complaints Handling Procedure](#)
- › [OP003 PO: Feedback and Complaints](#)
- › [PC003 PO: Code of Conduct](#)
- › [PC006 PO: Equal Employment Opportunity and Anti-Discrimination](#)
- › [PC010 PO: Sexual Harassment, Harassment and Bullying](#)

- › [PC018 PO: Employee Dismissal](#)
- › [GV015 PO: Privacy](#)
- › [GV025 PO: Fraud and Corruption Risk Assessment](#)

## 12. Where to go for more information

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- › Your Manager
- › National Manager People and Culture
- › Your Executive Director
- › Executive Director, Corporate Services
- › Whistleblower Governance Officers
- › Stroke Foundation Whistleblower Disclosure Service

Contact	Details
Email	makeareport@stopline.com.au
Telephone	1300 30 45 50
Website	<a href="https://strokefoundation.stoplinereport.com">https://strokefoundation.stoplinereport.com</a>
Smart APP	stopline365
Mail	Stroke Foundation, PO Box 403, Diamond Creek, VIC 3089

- › Australian Charities and Not-for-profits Commission (ACNC) <http://www.acnc.gov.au>
- › Australian Securities & Investments Commission (ASIC) <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/guidance-for-whistleblowers/>

Document Control		
Distribution	This document is confidential and strictly for internal use only	
Authoriser	Stroke Foundation Board	
Reviewer(s)	Executive Team	
Owner	Chief Executive Officer	
Target audience	Employees	
Training requirements	<input type="checkbox"/> Mandatory internal <input checked="" type="checkbox"/> Mandatory regulatory <input type="checkbox"/> Not required (reference policy)	
Training format	<input checked="" type="checkbox"/> Read and acknowledge <input checked="" type="checkbox"/> E-learning module <input checked="" type="checkbox"/> Announcement <sup>1</sup> <input type="checkbox"/> Face-to-face/Live training	
Training frequency	<input type="checkbox"/> One-off <input checked="" type="checkbox"/> Induction <input type="checkbox"/> Annual <input checked="" type="checkbox"/> When Policy updated <input type="checkbox"/> When significant change to policy	
Risk Profile	<b>Likelihood</b> <input type="checkbox"/> Almost Certain <input type="checkbox"/> Likely <input type="checkbox"/> Possible <input checked="" type="checkbox"/> Unlikely <input type="checkbox"/> Rare	<b>Consequence</b> <input type="checkbox"/> Catastrophic <input checked="" type="checkbox"/> Major <input type="checkbox"/> Moderate <input type="checkbox"/> Minor <input type="checkbox"/> Negligible
Overall Risk Assessment	<b>Overall Risk</b> <input type="checkbox"/> Very High <input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low	<b>Review Cycle</b> <input type="checkbox"/> Annual <input type="checkbox"/> Biennial <input checked="" type="checkbox"/> Triennial <input type="checkbox"/> Quadrennial
Next Review Date	02/05/2027	

<sup>1</sup> Announcement examples include: Teams post, email, video, PowerPoint presentation, poster.



## Version History

Version	Authoriser	Authorised	Summary of Changes
4.0	Board	02/05/2024	Minor editorial changes – updates to titles and minor edits.
3.0	Board	05/05/2021	Changes incorporates engagement of Disclosure Service entity who will be the first step in the lodgement of any Whistleblowing complaint and new Internal Complaints Handling Procedure.
2.0	Board	09/042020	<ul style="list-style-type: none"> <li>› Disclosure groups expanded to include former Stroke foundation personnel and their relatives</li> <li>› Governance officer updated</li> <li>› The term “in good faith” removed to comply with recent legislation update</li> <li>› New template</li> </ul>
1.0	Board	18/05/2018	New Policy and Procedure