



# Whistleblower Policy

## 1. Purpose

Lovemore Project is committed to the highest standards of ethical behaviour, transparency, and accountability.

This policy provides a framework for people to raise concerns about misconduct or improper conduct without fear of victimisation, retaliation, or disadvantage.

## 2. Scope

This policy applies to:

- Current and former Lovemore Project employees, directors, volunteers, contractors, consultants, and suppliers.
- Relatives, dependants, or spouses of the above.
- Any person who has a current or past relationship with Lovemore Project and has information on reportable conduct.

## 3. Policy Statement

Lovemore Project encourages the reporting of suspected misconduct and will:

- Protect whistleblowers from victimisation or retaliation.
- Investigate disclosures promptly and fairly.
- Maintain confidentiality as far as practicable and lawful.
- Take corrective action where wrongdoing is found.

## 4. Reportable Conduct

Conduct that can be reported under this policy includes:

- Fraud, theft, or corruption.
- Bribery or facilitation payments.
- Dishonest, unethical, or illegal activity.
- Misuse of donor funds or organisational assets.
- Serious breaches of ACNC, ACFID, DFAT or other regulatory requirements.
- Child safeguarding violations or PSEAH incidents.
- Harassment, discrimination, or abuse of authority.
- Actions causing significant risk to health, safety, or the environment.
- Concealment of any of the above.
- Personal work-related grievances that do not involve misconduct generally fall outside this policy and should be addressed through HR or complaints procedures.





## 5. Whistleblower Protections

In accordance with the Corporations Act:

- Whistleblowers are protected from civil, criminal, or administrative liability for making a protected disclosure.
- They are protected from victimisation or retaliation.
- Identity will remain confidential unless:
  - The whistleblower consents to disclosure.
  - Disclosure is required by law.
  - It is to a regulator (e.g., ACNC, ASIC, AFP).

Lovemore Project will also:

- Take reasonable steps to prevent reprisals.
- Provide support services (including EAP or equivalent) where needed.
- Ensure whistleblowers are kept informed on the progress and outcome of the matter where appropriate.

## 6. Making a Disclosure

Whistleblowers can make disclosures via:

- Email: [complaints@projectlovemore.org](mailto:complaints@projectlovemore.org)
- In person: Request a confidential meeting.
- Reports can also be made to:
  - External regulators (e.g., ACNC, ASIC, DFAT, AFP).
  - A legal practitioner for the purpose of obtaining legal advice.

## 8. Investigation Process

- Acknowledgement – The WPO will acknowledge receipt within 7 days.
- Preliminary Assessment – Determine if the disclosure is within scope of this policy and if it qualifies for protection.
- Investigation – Conducted fairly, promptly, and by an impartial person.
- Outcome – Findings documented; corrective actions implemented.
- Feedback – Whistleblower advised of the outcome, within confidentiality limits.

## 9. Confidentiality & Record-Keeping

- All disclosures and related records will be stored securely and only accessible to authorised personnel.
- Records will be kept for a minimum of 7 years.





## 10. False or Malicious Reports

- Lovemore Project treats all disclosures seriously. Deliberately false, vexatious, or malicious reports may result in disciplinary action, but this does not apply to disclosures made in good faith that cannot be substantiated.

## 11. Links to Other Policies

- Complaints Handling Policy
- Child Safeguarding & PSEAH Policy
- Financial Management / Anti-Fraud Policy
- Privacy Policy
- MEL Policy (serious incidents and safeguarding incidents feed into MEL learning and risk tracking)

## 12. Review

This policy will be reviewed every three years or earlier if:

- Legislative changes occur.
- New donor requirements are introduced.
- Lessons from investigations indicate the need for improvement.

- Approved by: Board of Directors – Lovemore Project
- Date: 12/09/25
- Next Review: 12/09/28

