

GOV-006

Enabling Services

Speak-Up Policy

Complaints and Whistleblowing

Global

Policy Owner: Legal Governance Risk and Compliance Director

1. PURPOSE

- 1.1** Speak up matters. It helps us prevent harm, address issues early, improve how we work, and uphold the values and commitments we have made to the communities we serve.
- 1.2** This Policy sets out:
- what you can raise
 - how you can raise it
 - what you can expect when you do
 - how your identity and information will be protected
 - the protections in place for those who speak up

You don't need to be certain or have proof

If something doesn't feel right – that is enough. You are encouraged to raise concerns early, even if you are unsure whether they are serious or what category they fall into. The Foundation will determine the appropriate process.

You do not need to decide what type of issue this is. Just speak up.

2. SCOPE

- 2.1** This Policy applies globally to all Personnel and stakeholders, including:
- employees, contractors, consultants, and volunteers
 - Board members and Senior Leaders
 - partners and representatives acting on behalf of The Foundation
 - beneficiaries and community members who interact with our work
 - members of the public with concerns about our operations
- 2.2** Where local law provides stricter protections or requirements than this Policy, local law prevails.

3. GUIDING PRINCIPLES

All concerns raised under this Policy will be managed in line with the following principles:

	Principle	What It Means
3.1	Safety First	Your wellbeing and safety are a priority at every stage. Speaking up should not place you at risk.
3.2	Survivor-Centred & Trauma-Informed	We prioritise the safety, rights, and wellbeing of the person impacted by the incident.

	Principle	What It Means
3.3	Confidentiality	We will protect your identity and honour requests for anonymity, subject to legal obligations. Information is handled on a strict need-to-know basis.
3.4	No Retaliation	No one will be disadvantaged for speaking up in good faith. Retaliation is taken seriously and may result in disciplinary action.
3.5	Fairness & Natural Justice	We handle concerns impartially, ensuring procedural fairness for everyone involved – both those raising concerns and those the concern is about.
3.6	Cultural Safety	We make every effort to ensure concerns are managed in a culturally safe and anti-racist manner.
3.7	Proportionate Response	Not every issue needs a formal investigation. Responses are tailored to the seriousness and context of the concern.
3.8	Transparency & Accountability	We clearly explain the process and possible outcomes. We learn from concerns and use them to improve.
3.9	Zero Tolerance	The Foundation has zero tolerance for abuse, fraud, misconduct, and for inaction in the face of these things.

4. WHAT CAN SPEAK UP ABOUT

4.1 How to make a General Complaint

Any concern or dissatisfaction about The Foundation’s work, programs, services, conduct, fundraising, or operations. This includes:

- poor, misleading, or inappropriate fundraising practices
- racism, cultural harm, or discrimination of any kind
- concerns about barriers to access or inclusion in our programs
- concerns about the conduct of people acting on our behalf

How to escalate unresolved General Complaints

The Foundation is a signatory to the ACFID Code of Conduct. If your complaint is unresolved, you may escalate to the ACFID Code of Conduct Committee (acfid.asn.au) or, for fundraising/marketing matters, to the Fundraising Institute of Australia (fia.org.au). Details are also at hollows.org/au/complaints. Phone: 1800 352 352 (Australia) or +61 2 8741 1900 (international).

4.2 Workplace matters

Concerns arising from your employment or engagement with The Foundation, including:

- interpersonal conflict, bullying, harassment, or discrimination
- management decisions, treatment, or performance-related matters
- workload, role scope, or unsafe work practices
- psychosocial risks (such as excessive demands, role conflict, or exposure to traumatic material)
- physical or psychological health and safety risks, incidents, or near misses

Routine personal work-related grievances (such as employment terms or conditions, performance management) are primarily managed through separate internal People & Organisational Development (POD) processes. These matters can still be raised through Speak Up channels and will be triaged appropriately.

4.3 Whistleblowing / Protected Disclosures

Whistleblowing refers to serious concerns about wrongdoing, misconduct, or risks, where legal protections apply to the person making the report.

You are protected as a whistleblower if you have reasonable grounds to suspect:

- serious misconduct, fraud, corruption, abuse, exploitation, harassment, or systemic breaches of policy or donor requirements
- conduct that is illegal or criminal under applicable law (including Australian law)
- conduct endangering the health, safety, dignity, or rights of individuals or communities
- breaches of international obligations (human rights, anti-corruption, anti-money laundering, counter-terrorism)
- financial crime, misuse of funds, or serious donor/regulatory non-compliance

You do not need to use the word 'whistleblowing'. The Foundation will assess whether legal whistleblower protections apply based on the nature of your concern, not the language you use.

As an Australian-registered organisation, whistleblowing protections are primarily informed by the Corporations Act 2001 (Cth), with a highest global standard approach applied. Local provisions apply where more stringent.

4.4 Safeguarding Concerns

Any concern involving actual or potential harm to a child or vulnerable adult, including:

- actual or potential harm to a child or vulnerable adult
- sexual exploitation, abuse, or harassment (SEAH)
- serious harm to individuals or communities (including racism, discrimination, or bullying of a child or adult beneficiary)
- safeguarding risks within programs or partnerships

⚠ Safeguarding concerns must be reported within 24 hours

These concerns are treated as the highest priority and have mandatory reporting requirements. Personnel must report immediately to speak-up@hollows.org or the Global Safeguarding Manager. The Foundation will notify affected donors within 24 hours of receipt.

Safeguarding concerns are managed under the Safeguarding People Policy and SEAH/Child Safeguarding Incident Management Procedures.

4.5 Serious Untoward Incidents (SUIs)

A Serious Untoward Incident is a rare but important medical or clinical incident that results in, or poses a risk of, serious illness, injury, or loss of life arising from medical care and interventions in Foundation programming.

SUIs must be reported within 24 hours to speak-up@hollows.org and are managed under the SUI Management Procedure.

5. HOW TO SPEAK UP

You can raise a concern in the way that feels safest for you. There are multiple channels available, and you may raise a concern openly, confidentially, or anonymously.

Channel	Contact / Detail
Email (Speak Up)	speak-up@hollows.org (confidential)
Web Form	www.hollows.org/au/complaints
Intranet Form	For staff refer to FredNet
Phone / WhatsApp	+61 418 814 609
Foundation Contact	For partners, community members you can speak to your primary contact at The Foundation
CEO	speak-up@hollows.org (Attention: CEO)
Line Manager or Senior Leader	For staff you can speak to any manager or Senior Leader you trust
Whistleblower Protection Officer	speak-up@hollows.org (Attention: WBPO) or for staff see FredNet
Legal, Governance, Risk & Compliance Director	speak-up@hollows.org (Attention: LGRC Director) or for staff see FredNet
Global Safeguarding Manager	speak-up@hollows.org (Attention: GSM) or for staff see FredNet
Financial Crime Officer	speak-up@hollows.org (Attention: FCO) or for staff see FredNet
External Bodies	ACFID, Fundraising Institute of Australia, local regulators or ombudsman bodies

All Personnel who receive a report under this Policy must promptly notify speak-up@hollows.org for triage and ensure the Legal, Governance, Risk & Compliance Director is notified as Officer of Notice.

Where a report involves a Whistleblowing Complaint and the reporter has requested confidentiality, notification to the Legal, Governance, Risk & Compliance Director may initially be limited to de-identified information, managed through the Whistleblower Protection Officer.

6. PROTECTIONS FOR WHISTLEBLOWER

If you make a report on reasonable grounds, you have specific legal rights and protections:

Protection	What It Means
No Retaliation	The Foundation will not tolerate dismissal, harassment, reassignment, demotion, or any other retaliation against you for speaking up in good faith.
Confidentiality	Your identity will be protected. Information is handled securely and shared only on a strict need-to-know basis, subject to legal obligations.
Immunity	If you report in good faith (not maliciously or vexatiously), you are protected from civil, criminal, or administrative liability for making the report.
Support	You will have access to support services including the Employee Assistance Program (EAP) and wellbeing support.
Anonymous Reporting	You may report anonymously. Note that anonymous reports may limit our ability to investigate fully if insufficient information is provided.

Any Personnel who retaliates against someone who has, in good faith, reported or participated in a review or investigation will be subject to discipline, up to and including termination of employment or volunteer status.

External reporting options

You may also make a whistleblowing report to relevant Corporate Regulators, including ASIC, APRA, or the ATO. The Foundation may not be aware of such reports and may be unable to respond under this Policy.

In limited cases, public-interest or emergency disclosures to a journalist or parliamentarian may also be permitted under law, but strict conditions apply. Seek independent legal advice before taking this step.

Disclosures made to a legal practitioner for the purpose of obtaining legal advice may be protected under Australian or local law.

7. CONFIDENTIALITY

7.1 We handle all concerns with care, respect, and discretion. We will:

- protect your confidentiality wherever possible
- speak with you about what information may need to be shared
- only share information on a need-to-know basis
- limit disclosures to what is strictly necessary

7.2 When confidentiality may be limited

There are times when full confidentiality cannot be maintained. This may occur where:

- there is a risk of harm to you or others
- safeguarding obligations apply
- legal or regulatory reporting is required
- we have a duty of care to act

If this happens, we will explain why and keep you informed where we can.

7.3 Your role in maintaining confidentiality

When you raise a concern, we also ask that you:

- keep the matter confidential
- avoid discussing it widely or informally
- avoid independent fact-finding or investigation
- not share information that could affect fairness, safety, or wellbeing

You can still seek personal or professional support, as long as confidentiality is maintained.

All personal information is handled in line with our Privacy Policy and all applicable privacy and data protection laws, including requirements for cross-border data transfers.

8. WHAT HAPPENS WHEN YOU SPEAK UP

8.1 What you can expect when you raise a concern:

Stage	What Happens
1. Acknowledge	We confirm receipt of your report, usually within 5 working days. You are offered an opportunity to discuss the concern, ask questions about process and confidentiality, and request a support person.
2. Wellbeing First	We first ensure the safety of anyone affected – victim/survivor, or reporter – and offer appropriate support.

Stage	What Happens
3. Preliminary Assessment	Every report is assessed to determine its nature, seriousness, category, and the appropriate pathway. Mandatory reporting obligations are acted on regardless of how the concern was initially raised.
4. Pathway & Investigation	Matters assessed as requiring investigation are handled by an Incident Investigation Team constituted by the Legal, Governance, Risk & Compliance Director. Responses are proportionate to the seriousness of the concern.
5. Outcome	A response is provided within 30 working days, subject to complexity. If this timeline cannot be met, a revised timeline and explanation will be provided. The response will contain as much information as possible while protecting confidentiality and the privacy of all parties.
6. Closure	The Legal, Governance, Risk & Compliance Director closes cases once satisfied the investigation was fair and all actions are complete. You will be notified when your matter is closed.
7. Donor Notification	Where a donor's funds or programs are impacted, they will be notified within 24 hours, or in accordance with the specific donor agreement, and kept informed throughout the process.

8.2 Pathways for Different Concern Types

Depending on the nature of the concern, it will be directed to the most appropriate pathway:

Concern Type	How it will be managed
Safeguarding (child safety, SEAH)	Global Safeguarding Manager manages in line with the Safeguarding People Policy and Safeguarding Case Management Procedure
Serious Untoward Incidents (SUIs)	Clinical Safety Officer manages in line with the Clinical Governance Policy and SUI Report Procedure
Workplace grievances & interpersonal matters	People & Organisational Development via grievance or conflict resolution processes
Health, safety & psychosocial risks	POD Team and/or Security Officer manage under WHS frameworks and incident/risk management processes
Integrity, ethics & compliance	Legal, Governance, Risk & Compliance and, where relevant, the Financial Crime Officer will manage compliance, financial crime, or investigation pathways in accordance with the Financial Crime Policy or other relevant policy.
Whistleblowing / Protected Disclosures	Whistleblower Protection Officer manages in line with the Whistleblower Complaint Procedure and all applicable whistleblowing legislation and frameworks
General Complaints	Centrally triaged and response determined by the relevant manager according to the subject of the complaint

9. ROLES AND RESPONSIBILITIES

Role	Responsibilities
Board / Governance People & Culture Committee	Oversees the nature of the complaints process; receives material complaints in quarterly reporting; escalated high-risk matters immediately.
Chief Executive Officer	Ensures this Policy is upheld; informs the Board of material risks; holds Senior Leaders accountable.
Legal, Governance, Risk & Compliance Director (Policy Owner)	Promotes this Policy; constitutes investigation teams; manages material complaints; closes cases; quarterly Board reporting.
Whistleblower Protection Officer	Receives and manages Whistleblowing Complaints; ensures protections are in place; manages confidentiality.
Global Safeguarding Manager	Receives and triages safeguarding concerns; activates mandatory reporting frameworks.
Financial Crime Officer	Manages financial crime-related concerns and donor notifications.
Senior Leaders	Monitor and respond to concerns arising in their area; maintain divisional compliance with this Policy; escalate as required.
All Personnel	Raise concerns in good faith; report known concerns; maintain confidentiality of Speak Up matters; cooperate with investigations.

10. DEFINITIONS

You do not need to understand these definitions to speak up. They are provided for reference.

Term	Definition
Beneficiary	An individual, group, or community that receives direct or indirect benefits from a Foundation program or intervention.
Complainant	A person who raises a concern, complaint, allegation, or disclosure under this Policy, whether openly, confidentially, or anonymously.
Cultural Harm	Negative impacts or erosion inflicted upon a community's traditions, beliefs, identity, or heritage – often through systemic racism, imposition of foreign values, or destruction of cultural heritage.
Discrimination	Unfair or less favourable treatment of a person based on a protected attribute, including race, ethnicity, sex, gender identity, sexual orientation, age, disability, religion, or marital status. May be direct or indirect.
General Complaint	Any expression of dissatisfaction, concern, or feedback about The Foundation's work, programs, services, conduct, fundraising, or operations. Does not include personal work-related grievances or matters meeting the definition of a Whistleblowing Complaint.
Good Faith Report	A report made honestly, with genuine belief the information is true or likely to be true. A report is in good faith even if the concern is not ultimately substantiated. A report is not in good faith where it is knowingly false, misleading, or made primarily for malicious or retaliatory purposes.

Term	Definition
Grievance	A workplace-related concern about employment, working conditions, interpersonal relationships, management decisions, or treatment at work.
Misconduct	Any failure by Personnel to comply with their obligations under the Code of Conduct or other relevant policy.
Natural Justice / Procedural Fairness	The fundamental principle that decisions are made through fair, transparent processes – including the right of affected persons to be informed of allegations, to respond, and to have decisions made without bias.
Partner	Any entity or organisation that collaborates with the Foundation to achieve shared programmatic objectives.
Personnel	Any person who carries out work for the benefit of the Foundation, including employees, contractors, consultants, volunteers, partners, suppliers, and work experience students.
Protected Disclosure (Whistleblowing)	A disclosure of information concerning suspected misconduct, serious wrongdoing, illegal activity, or breaches of policy, law, or donor requirements, where the disclosure is protected under applicable whistleblowing or regulatory frameworks.
Racism	Conduct, language, attitudes, or practices that express or reinforce prejudice, discrimination, or hostility against a person or group based on race, ethnicity, colour, national origin, or cultural identity. May be overt, systemic, intentional, or unintentional.
Retaliation / Victimisation	Any direct or indirect adverse action against a person because they have raised a concern, made a disclosure, or participated in an investigation. Includes dismissal, demotion, discrimination, threats, or intimidation.
Safeguarding Concern	Any concern relating to actual or potential harm, exploitation, or abuse of a child or vulnerable adult, including SEAH, within the Foundation’s operations, programs, or partnerships.
Senior Leader	A person whose role in The Foundation is Director level or above.
Serious Untoward Incident (SUI)	A rare but important medical or clinical incident resulting in, or posing a risk of, serious illness, injury, or loss of life arising from medical care and interventions in Foundation programming.
Whistleblower	An individual who can make a Whistleblowing Complaint, including Foundation officers, employees, contractors, implementing partners, associates, relatives or dependants of the above, or beneficiaries of Foundation-funded programs.
Whistleblowing Complaint	A complaint relating to misconduct or an improper state of affairs as defined in Section 4.3 of this Policy. Does not include general enquiries, information requests, or personal grievances.

CONTROL OF DOCUMENTATION

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Related Policies	GOV-008 Financial Crime Policy; GOV-011 Privacy Policy; GOV-004 Safeguarding People Policy; OPR-001 Health, Safety and Wellbeing Policy; Code of Conduct, SEAH Incident Management Procedure, Child Safeguarding Incident Management Procedure, SUI Management Procedure, People & Culture Grievance Procedures; and any other Foundation policy or procedure that includes a complaint element/avenue.		