

## **BCRGPL- 057: Whistleblower**

<b>Applies to:</b> Management Committee, Executive Officer, Employees, Volunteers, Clients and Contractors
<b>Specific responsibility:</b> Management Committee members (WPO), Executive Officer (WIO), Team leaders

### **INTRODUCTION**

BCRG is committed to operating legally (in accordance with applicable legislation and regulation), properly (in accordance with organisational policy and procedures), and ethically (in accordance with recognised ethical principles). Employees are expected to cooperate with the organisation in maintaining legal, proper, and ethical operations, if necessary by reporting non-compliant actions by other people. Correspondingly, employees who do assist in maintaining legal, proper, and ethical operations should not be penalised in any way.

### **PURPOSE**

The purpose of this Whistleblower policy is to:

- a) encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to BCRG or damage to its reputation;
- b) enable BCRG to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided;
- c) establish policies for protecting whistleblowers against reprisal by any person internal or external to the entity;
- d) provide for the appropriate infrastructure;
- e) help to ensure BCRG maintains the highest standards of ethical behaviour and integrity.

### **POLICY**

#### **Concerns regarding illegal or corrupt behaviour**

Where an employee of BCRG believes in good faith on reasonable grounds that any other employee, volunteer, or contractor has breached any provision of the general law, that employee must report their concern to

- their supervisor: or, if they feel that their supervisor may be complicit in the breach,
- the Executive Officer (EO): or, if they feel that the EO may be complicit in the breach,
- the organisation's nominated Whistleblower Protection Officer (WPO); or, if they feel this to be necessary,
- a person or office independent of the organisation nominated by the organisation to receive such information, or
- the duly constituted authorities responsible for the enforcement of the law in the relevant area.

The person making their concern known shall not suffer any sanctions from the organisation on account of their actions in this regard provided that their actions

- are in good faith, and
- are based on reasonable grounds, and
- conform to the designated procedures.

Any person within the organisation to whom such a disclosure is made shall

- if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision;
- if they believe the behaviour complained of to be neither trivial nor fanciful, ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding.

Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the organisation.

### **Concerns regarding improper or unethical behaviour**

Where an employee of BCRG believes in good faith on reasonable grounds that any other employee, volunteer, or contractor has breached any provision of the organisation's constitution, or its policies and procedures, or generally recognised principles of ethics, that employee may report their concern to

- their supervisor: or, if they feel that their supervisor may be complicit in the breach;
- the EO: or, if they feel that the EO may be complicit in the breach;
- the BCRG Management Committee (MC) or, if they feel that the MC may be complicit in the breach;
- the relevant funding body or contractor

The person making their concern known shall not suffer any sanctions from the organisation on account of their actions in this regard provided that their actions

- are in good faith, and
- are based on reasonable grounds, and
- conform to the designated procedures.

Any person within the organisation to whom such a disclosure is made shall

- if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision;
- if they believe the behaviour complained of to be neither trivial nor fanciful, ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding.

Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the organisation.