

## Introduction

RSL Queensland is committed to fostering a ‘speak up’ culture in which honesty, integrity, and ethics form part of everyday behaviour.

RSL Queensland encourages the reporting of any matters which may be considered unethical, illegal, dishonest or an act of serious wrongdoing (Reportable Conduct). This policy complements RSL Queensland’s Code of Conduct and Fraud, Bribery and Corruption Policy and reinforces our culture of open communication, doing what is right, and encouraging employees and volunteers to speak up and report corrupt, illegal or undesirable conduct.

## Purpose

This policy aims to provide clarity on how RSL Queensland supports its people to:

- feel encouraged to report concerns
- know how to report concerns
- know what will happen when concerns are reported
- feel safe when reporting concerns.

This policy provides a framework which helps to identify instances of wrongdoing and provide guidance on how to raise a concern about suspected or actual unethical or unlawful behaviour.

RSL Queensland has developed this policy in line with Australian Standard 8004-2003 Whistleblower Protection Programs for Entities, for situations where an employee wishes to disclose an incident(s) of Reportable Conduct but has formed the view, that RSL Queensland’s normal reporting processes are not appropriate in the circumstances.

## Who it applies to?

This policy applies to all RSL Queensland employees, including the RSL Queensland Board and members of Board sub committees, the Chief Executive Officer, Executives, visitors, contractors, consultants and RSL volunteers.

It does not apply to subsidiary companies, trusts, Districts, Sub Branches, League members and volunteers, however, it may be used by these entities as guidance for the development of their respective policies.

## Policy statement

RSL Queensland is committed to encouraging all employees to be responsible for speaking up and reporting corrupt, illegal, or undesirable conduct.

All disclosures of Reportable Conduct will be protected, assessed, investigated, and reported in accordance with the requirements of this policy. Retaliation or victimisation of whistleblowers will not be tolerated.

An individual who discloses Reportable Conduct may be protected from civil and criminal liability. This is referred to as “protected disclosure”.

Protected disclosure includes protection from a breach of the confidentiality clause in the employee’s Employment Agreement.

An employee cannot be terminated, demoted, harassed, discriminated against, or shown any bias from RSL Queensland after having made a protected disclosure, and RSL Queensland will take reasonable steps to ensure that the employee is not subjected to victimisation or persecution.

The provisions offered under protected disclosure may not be available to an employee who makes a disclosure that is not based on reasonable grounds, is malicious or where the employee was involved in the Reportable Conduct.

Protection and assistance will be offered to employees who make a disclosure of Reportable Conduct against their Manager or a colleague. This may include:

- placing the employee on temporary paid leave
- relocating the employee either temporarily or permanently
- redeploying the employee to another role, either temporarily or permanently
- offering the employee access to the Employee Assistance Program.

RSL Queensland will take reasonable measures to ensure that all employees are aware of, and understand the Whistleblower Policy, and the types of behaviour or scenarios that constitute Reportable Conduct.

## Definitions

Term	Definition
Reportable Conduct in relation to RSL Queensland	Reportable Conduct is anything that an employee has reasonable grounds to suspect, in relation to RSL Queensland, that is: <ul style="list-style-type: none"> <li>• misconduct, or an improper state of affairs or circumstances</li> <li>• conduct that constitutes a contravention of laws specified in the Whistleblower Laws or other Commonwealth laws</li> <li>• conduct that represents a danger to the public or financial system.</li> </ul>
Reportable Conduct	Reportable conduct includes but is not limited to activities that are: <ul style="list-style-type: none"> <li>• illegal</li> <li>• corrupt</li> <li>• fraudulent</li> <li>• dishonest</li> <li>• unethical</li> <li>• unlawful</li> <li>• constituting an unsafe work-practice</li> <li>• constituting serious improper conduct giving rise to the possibility of causing financial or non-financial loss to RSL Queensland.</li> </ul>

Not Reportable Conduct	<p>This policy is not intended to apply to disclosures relating to personal work-related grievances as described below:</p> <ul style="list-style-type: none"> <li>• an interpersonal conflict between you and another employee</li> <li>• a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action</li> <li>• alleged workplace discrimination or bullying between staff.</li> </ul>
Whistleblowing	<p>Whistleblowing is the term used when an individual reports wrongdoing in an organisation, for example financial misconduct or discrimination. This person is often an employee but can also be a third-party such as a supplier or client.</p>

## How to make a whistleblower report?

Employees are responsible for contacting a suitably senior member of RSL Queensland to disclose an allegation of Reportable Conduct. For example:

- Chief HR Officer
- Executive Leadership Team
- Company Secretary
- Legal Team
- Line Manager.

A disclosure can also be made to the external whistleblower service, via this link.

<http://www.rslqueensland.deloitte.com.au>

The allegation will then be forwarded to the General Manager – Legal, Governance and Risk for investigation.

The procedure associated with reporting and investigation of Reportable Conduct is an employee may make a report under this policy or under the Fraud, Bribery and Corruption Policy.

## Who's responsible?

RSL Queensland is committed to appointing and maintaining an appropriately qualified Whistleblower Protection Officer. The General Manager – Legal, Governance and Risk is RSL Queensland's designated representative with the responsibility of protecting and safeguarding the interests of whistleblowers.

Employees may make a disclosure anonymously or ask the General Manager – Legal, Governance and Risk that their identity not be disclosed. RSL Queensland is committed to protecting employees who make genuine disclosures, and all reasonable efforts will be made to ensure that anonymous disclosures remain anonymous. However, anonymity cannot be guaranteed in certain circumstances (e.g., legal papers, court orders).

The Chief Executive Officer and management at all levels will be held accountable for the quality of response to issues disclosed by whistleblowers and to reports of retaliation as well as for supporting policies that ensure misconduct at RSL Queensland is disclosed.

## Investigations

RSL Queensland is also committed to appointing and maintaining an appropriately qualified Whistleblower Investigations Officer. The nominated Whistleblower Investigations Officer is responsible for investigating the Reportable Conduct and advising any other relevant RSL Queensland business area as appropriate (e.g., Human Resources and Finance) so that a plan can be developed to investigate the disclosure.

In addition to ensuring investigations are completed thoroughly, confidentially and in a timely manner, the General Manager – Legal, Governance and Risk will ensure that an appropriate person is nominated as the Whistleblower Investigations Officer to manage the investigation, and any resulting action(s).

Due to confidentiality constraints, the outcome of any investigation, and resulting action taken by RSL Queensland, may not be made available to the employee who made the disclosure.

All investigations will be conducted in a manner that is consistent with the rules of natural justice and devoid of bias or prejudice against the employee or any person against whom the allegation is made.

## What happens if this policy is breached?

Compliance with this policy is a condition of employment and ongoing engagement with RSL Queensland. Breaches of this policy will lead to disciplinary action up to and including termination of employment or of association.

All suspected breaches of this policy must be reported to the General Manager – Legal, Governance and Risk on 07 3634 9432 or alternatively via email [whistleblower@rslqld.org](mailto:whistleblower@rslqld.org).

The identity of the person reporting the breach will be protected where possible.

RSL Queensland will monitor and review this policy regularly to assess its effectiveness in encouraging the reporting of Reportable Conduct, protection of persons making reports, investigating fairly and effectively and rectifying verified wrongdoing.

This monitoring will be facilitated by reports to the Audit and Risk Committee and/or the Board that will not compromise confidentiality. A report will be provided to the Board of the outcome of each review.

## Important documents

### Key Legislation:

- *Whistleblowers Protection Act 1994 (Qld)*
- *Australian Standard 8004-2003 Whistleblower Protection Programs for Entities*

### RSL Queensland Related Documents:

- Code of Conduct
- Conflict of Interest Policy
- Fraud, Bribery and Corruption Policy
- Workplace Health and Safety Policy

## Need more info?



For questions about this policy, please contact RSL Queensland's General Manager, Legal, Risk & Compliance or speak to your HR Business Partner.

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