



Subject: Whistleblower (Protected Disclosure)

Purpose

To help us to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing. We encourage employees (and non-employees) who are aware of possible wrongdoing to have the confidence to speak up. This policy has been put in place to provide a safe and confidential environment where concerns can be raised without fear of reprisal or detrimental treatment.

Whistleblowing is a key element of our governance framework and is important in achieving transparency and accountability. This policy supports our core values and [Code of Conduct](#). It is designed to support our long-term sustainability and reputation and to meet our legal and regulatory obligations.

Policy statement

We are committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

We are committed to the protection of individuals who disclose information about illegal or improper conduct occurring within Cerebral Palsy Alliance (CPA).

Who is this policy for?

All Officers, employees and contractors of CPA must comply with this policy.

Who is responsible for this policy?

- CPA's Protected Disclosure Coordinators are responsible for implementation of this policy
 - Chief Executive Officer
 - Company Secretary
 - General Manager Strategy, Quality and Risk.
- Anyone who is entitled to receive a disclosure (e.g. Board Member, Company Secretary, Executive Team member or otherwise) is responsible for implementation and compliance monitoring of this policy.

For further information refer to section 2 of the [Whistleblower \(Protected Disclosure\) Guidelines](#).

Policy in action

- The objectives of this policy are to:
 - ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported
 - ensure disclosures are dealt with appropriately and in a timely manner
 - provide transparency around our framework for receiving, handling and investigating disclosures
 - encourage more disclosures of wrongdoing
 - help deter wrongdoing.
- The Guidelines linked to this policy set out:
 - who is entitled to protection as a whistleblower
 - the protections whistleblowers are entitled to
 - who a disclosure can be made to
 - how disclosures made by whistleblowers in accordance with this policy will be handled by CPA.

Definitions

(Note: The meanings of words that are used a lot at CPA are located in the [CPA Common Definitions](#). The words in the list below are new and are only used in this policy and the other documents that are part of this policy).

For definitions related to this policy, refer to the [Whistleblower \(Protected Disclosure\) Guidelines](#).

Documents that are part of this policy

Guidelines

[Whistleblower \(Protected Disclosure\) Guidelines](#) (on CPA website)

A copy of this policy is available on our website at <https://cerebralpalsy.org.au/who-we-are/policies/>.

Related policies and further reading

[Rights Policy](#)

[Code of Conduct Policy](#)

[Good Working Relations Policy](#)

[Employee Resignation, Termination or Retrenchment Policy](#)

[ASIC Regulatory Guide 270 – Whistleblower Policies](#)

Policy Owner	General Counsel & Company Secretary
Date Approved	18/12/19
Approval Authority	CEO
Date of Commencement	1 December 2016
Date for Next Review	December 2021
Related Legislation	Corporations Act 2001 (Cth) Taxation Administration Act 1953 (Cth) Income Tax Assessment Act 1936 (Cth)

Revision history

Note: Reviewed and rewritten policies and procedures took effect in September 2016. For revision history prior to this date, contact the Company Secretary.

Review Date	Revision Details
18/12/19	<ul style="list-style-type: none"> Reviewed, updated and renamed in line with legislative requirements coming into effect 1 Jan 2020 under the Corporations Act. Deleted NS6-3-9-Pr1 Protected Disclosure Responsibilities and NS6-3-9-App1 Protected Disclosures not in Good Faith. Added NS6-3-9-G1 Whistleblower (Protected Disclosure) Guidelines. Changed policy owner from GM, People & Culture to General Counsel & Company Secretary.
23/11/21	<ul style="list-style-type: none"> Updated policy, changed Disclosure Coordinator from Senior Manager, Quality and Safeguarding to General Manager Strategy, Quality and Risk. Updated NS6-3-9-G1 Whistleblower (Protected Disclosure) Guidelines <ul style="list-style-type: none"> changed Disclosure Coordinator from Senior Manager, Quality and Safeguarding to General Manager Strategy, Quality and Risk updated postal address.
18/05/22	<ul style="list-style-type: none"> Updated NS6-3-9-G1 Whistleblower (Protected Disclosure) Guidelines <ul style="list-style-type: none"> changed Disclosure Coordinator from General Manager Strategy, Quality and Risk to Senior Quality Manager.