

Guide Dogs.

Whistleblowing Policy

Version History

Version	3
Owner:	Chief People Officer, on behalf of the GDN Board
Date of last review:	June 2026
Next Review:	June 2027

1. Our Commitment

Guided by our purpose and values, Guide Dogs NSW/ACT (**GDN, we us, our**) is committed to maintaining a culture of integrity, respect, ethical conduct and accountability. This Policy aims to:

- encourage reporting of wrongdoing
- ensure people feel safe and supported when raising concerns
- provide a clear process for receiving, assessing, and responding to disclosures
- uphold GDN's legal, regulatory and ethical obligations, and
- protect the long-term reputation and trust placed in GDN.

2. Related Procedure

This Policy sets out GDN's commitment to supporting whistleblowers, the standards that apply to whistleblowing, and the protections available under law.

The GDN Whistleblowing Procedure (**Procedure**), provides practical guidance on how to make a report, who reports can be made to, how disclosures are handled, and the support available throughout the process. The Policy and Procedure should be read together.

3. Scope

This Policy applies to all Eligible Persons. Employees, Volunteers, Board members and contractors are expected to comply with this Policy.

4. Policy Statement

Guided by our purpose, values and Code of Conduct, GDN encourages Eligible Persons to speak up and report Reportable Matters. Doing so helps protect the people we serve, supports ethical decision-making, and maintains trust in our organisation.

Disclosures made on reasonable grounds are protected. GDN will not tolerate victimisation or retaliation against a person who makes, or is believed to have made, a disclosure.

A person's identity will be kept confidential and will not be disclosed without their consent, except where required or permitted by law. Eligible Persons will not be subject to disciplinary, civil, administrative or criminal liability for making an eligible disclosure.

All information relating to a disclosure will be handled securely and access will be limited to authorised personnel.

GDN expects disclosures to be made honestly. Knowingly false or malicious disclosures are not protected and may result in disciplinary action.

5. What can be Disclosed

Disclosures under this Policy must relate to a Reportable Matter.

A Reportable Matter is defined in section 16 of this Policy. In general, it involves information that gives reasonable grounds to suspect serious wrongdoing, misconduct or an improper state of affairs relating to GDN.

Personal work-related grievances are generally not covered by this Policy, unless they involve victimisation of a whistleblower or reveal broader wrongdoing.

6. Who Disclosures can be made to

Disclosures may be made:

- internally to a Responsible Person
- through GDN's independent whistleblowing service provider (Your Call), or
- to external authorities or other recipients permitted by law.

Practical guidance on reporting options is set out in the Procedure.

7. Protections under this Policy

Eligible Persons who make disclosures on reasonable grounds are entitled to protections under applicable Whistleblower Laws, including:

- protection of identity (confidentiality)
- protection from detriment or victimisation

- immunity from civil, criminal or administrative liability for making the disclosure, and
- secure handling of information relating to the disclosure.

8. Confidentiality

GDN is committed to maintaining the confidentiality of a person who makes a disclosure.

Information that identifies, or is reasonably likely to identify, a whistleblower will not be disclosed without their consent, except where disclosure is required or permitted by law.

9. Victimisation

Victimisation of a person because they have made, or are believed to have made, a disclosure is prohibited.

Victimisation may include dismissal, injury, discrimination, harassment, intimidation, harm, or other detrimental treatment.

GDN will take appropriate action where victimisation occurs.

10. False or Malicious Disclosures

Disclosures should be made honestly and on reasonable grounds.

Knowingly false or malicious disclosures are not protected under this Policy and may result in disciplinary action.

A disclosure made honestly will not be treated as malicious simply because it is not substantiated.

11. Governance and Oversight

This Policy is owned by the GDN Board.

The Chief People Officer is responsible for maintaining this Policy on behalf of the GDN Board.

All Responsible Persons are responsible for implementation of, and compliance with this Policy, including appropriate reporting and oversight.

12. Breach of this Policy

Breaches may result in disciplinary action, including termination of employment or cancellation of membership.

13. Status of this Policy

This Policy does not impose enforceable obligations (contractual or otherwise) on GDN.

14. Availability

This Policy will be available internally on the intranet and publicly on GDN's [website](#).

15. Definitions

This section outlines some key words which are commonly used throughout this Policy and the Procedure.

ASIC: means the Australian Securities and Investments Commission.

Board member: means directors of the Guide Dogs NSW/ACT Board.

Eligible Person: means a person who is eligible for protection as a whistleblower under the Whistleblower Laws, including:

- Clients, Employees, Students and Volunteers
- Board members, members and advisory panel members
- contractors, suppliers of goods and services, and
- any relative, dependant or spouse of the above individuals.

Employee: means a person employed by GDN (including full-time, part-time and casual employees).

ELT: means a member of GDN's Executive Leadership Team.

GDN: means, collectively and severally, Guide Dogs NSW/ACT and its Related Bodies Corporate.

Reportable Matter: Information that gives reasonable grounds to suspect misconduct, an improper state of affairs, breaches of law, unethical behaviour, safety risks, fraud, corruption, maladministration, major waste, serious privacy breaches, or concealment of such conduct, see 'What can be disclosed' for examples of Reportable Matters.

Responsible Person: means each of the following positions, which are designated to receive disclosures under this Policy:

- the Chief Executive Officer (CEO) of GDN
- any member of the Executive Leadership Team (ELT)
- the Company Secretary
- GDN's external whistleblowing service provider, Your Call
- any Board member (including the Chair), and
- the Chair of the GDN Board, where the report concerns a Board member, Board Committee member, the CEO or a member of the ELT.

Student: means an individual enrolled in an educational institution who is participating in vocational placement or work-integrated learning on GDN premises or under Employee supervision.

Volunteer: means an individual who offers their services, skills and experience of their own free will to perform agreed tasks for GDN without compensation or reward.

Whistleblower Laws: means any of the regimes contained in Part 9.4AAA of the Corporations Act 2001 (Cth), Part IVD of the Taxation Administration Act 1953 (Cth) and the Aged Care Act 2004 (Cth).

Your Call: GDN's independent whistleblowing service provider.

16. Related Documents

- [ASIC Regulatory Guide 270](#)
- GDN Code of Conduct
- GDN Whistleblowing Procedure