

Guide Dogs.

Whistleblowing Procedure

Version History

Version	1
Owner:	Chief People Officer
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1. Overview

This Procedure supports and should be read together with the GDN Whistleblowing Policy (**Policy**).

The Policy sets out Guide Dogs NSW/ACT's (**GDN, we us, our**) overarching principles, legal obligations, definitions, and the protections available to Eligible Persons who make a disclosure.

This Procedure provides practical, step-by-step guidance to help you understand:

- whether the information you wish to report is a Reportable Matter
- how and to whom you can make a disclosure
- what happens after a disclosure is made, and
- the support available to you throughout the process.

If there is any inconsistency between this Procedure and the Policy, the Policy prevails.

2. Who is eligible for whistleblower protection?

To be covered under the Policy, you must:

- be an Eligible Person
- disclose information relating to a Reportable Matter, and
- disclose that information to a Responsible Person.

3. Are you an Eligible Person?

To be covered under the Policy, you must be an Eligible Person.

Eligible Person has the meaning given in the Policy. In general, this includes people who currently or previously had a relationship with GDN, such as Clients, Employees, Volunteers, Board members, contractors and certain related individuals.

If your disclosure is made under the Aged Care Act 2024 (Cth) (**Aged Care Act**), you do not need to meet the above criteria to be an Eligible Person. Anyone may disclose information about a Reportable Matter under the Aged Care Act, provided the disclosure is made to a Responsible Person or another recipient permitted under that Act.

If you are unsure whether you are an Eligible Person, you may contact Your Call or a Responsible Person for guidance before making a report.

4. Reportable Matters

Reporting Criteria

You can make a report if you have reasonable grounds to believe that the information you are providing relates to serious wrongdoing or misconduct and meets the definition of Reportable Matters under the Policy. You do not need to be certain or have proof.

You will not be penalised if the information you report turns out to be incorrect, provided the report was made honestly and was not knowingly false or misleading.

Examples

The following are examples of matters that may be Reportable Matters. This is not an exhaustive list:

- illegal or improper conduct, such as fraud, corruption, bribery, theft, negligence, breach of trust or misuse of position
- unethical or unsafe behaviour, including conduct that puts Clients, Employees, Volunteers, the public or the environment at risk
- breaches of law or regulation, including the Corporations Act 2001 (Cth), the Aged Care Act, or other Commonwealth laws punishable by 12 months' imprisonment or more
- serious financial or governance issues, such as financial irregularities, major waste, or systemic problems a regulator should be aware of

- an improper state of affairs, including ongoing practices or behaviours that fall well below expected legal or ethical standards, and
- conduct that poses a danger to the public.

Personal work-related grievances

This Procedure does not cover personal work-related grievances. These are issues that relate only to an individual's employment and affect them personally. Personal work-related grievances include, but are not limited to:

- disagreements or conflicts between Employees
- decisions about recruitment, engagement, transfer, promotion or termination
- performance management, disciplinary action, harassment or discrimination matters, and
- behaviour that is unfair or unreasonable but does not involve broader wrongdoing.

These issues should generally be raised through the GDN Grievance & Complaints process, unless one of the exceptions in 5.4 'When a personal grievance may still be covered' applies.

When a personal grievance may still be covered

A disclosure that includes a personal work-related grievance may still be covered by this Procedure where:

- the person has suffered, or is threatened with, detriment for making a disclosure, or
- the disclosure also involves serious wrongdoing beyond the individual's personal circumstances, including:
 - misconduct or an improper state of affairs or circumstances
 - a breach of the law, including the Corporations Act 2001 (Cth) or the Aged Care Act
 - an offence under a Commonwealth law punishable by imprisonment for 12 months or more, or
 - conduct that poses a danger to the public.

5. Who do you report to?

A disclosure may be made to:

- A Responsible Person
- Your Call (independent provider):

- Online: <https://www.yourcall.com.au/report> (organisation code: GDN)
 - Phone: 1300 790 228 (9am – 12am business days), or
 - Government and external authorities, or a legal practitioner for advice
- Disclosures may be made anonymously.

Reporting to a Responsible Person within GDN

To receive protection under this Procedure, a disclosure about a Reportable Matter may also be made directly to one of the following Responsible People within GDN:

- the Chief Executive Officer (CEO)
- a member of the Executive Leadership Team (ELT)
- the Company Secretary
- any Board member
- the Chair of the GDN Board, where the report concerns a Board member, Board Committee member, the CEO or a member of the ELT
- GDN's external auditor, addressed to GDN's Audit Partner: Grant Thornton, Sydney.

Reporting through Your Call (independent and confidential)

You can make a disclosure about a Reportable Matter through GDN's independent whistleblowing provider, [Your Call](#). Your Call is an external, confidential service that allows you to make a report safely and, if you choose, anonymously. It also supports two-way communication while protecting your identity.

You can contact Your Call via:

- Web: <https://www.yourcall.com.au/report> (Organisation code: GDN)
- Phone: 1300 790 228 (9am–12am, business days)

Disclosures made through Your Call will be passed on to GDN, while maintaining confidentiality and any anonymity you request.

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method via <https://www.accesshub.gov.au/> and request Your Call's hotline 1300 790 228.

If you have difficulty speaking or understanding English, contact Your Call through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

Reporting to external authorities

A disclosure about a Reportable Matter may also be made to certain external authorities, including:

- the Australian Securities and Investments Commission (ASIC)
- the Commissioner of Taxation, where the disclosure relates to GDN's tax affairs
- any other Commonwealth authority prescribed by law.

Some reports may be protected by law if they are made to an external authority. Where this occurs, the authority will be responsible for how the report is handled.

In limited circumstances, the law also allows disclosures to a journalist or a parliamentarian if authorities do not deal with a report properly. These options sit outside the scope of the Policy, and independent legal advice should be sought before taking this step.

Disclosures under the Aged Care Act 2024

If your disclosure is made under the Aged Care Act 2024, it may be made to:

- an Appointed Commissioner, or a staff member of the Aged Care Quality and Safety Commission
- the System Governor (Secretary), or an official of the Department of Health and Aged Care
- a registered provider, a responsible person of a registered provider, or an aged care worker of the registered provider
- a police officer, or
- an independent aged care advocate.

6. What should you include in your report?

Information to include

To help GDN understand and respond to your disclosure, it is helpful if your report includes as much of the following information as you are comfortable providing:

- what happened (facts, events or conduct)
- when and where it happened
- the names of any people involved or who may have witnessed the events
- any documents, emails or other evidence that support the information you are providing

- whether you are worried about victimisation or need support, and
- whether you consent to your identity being shared (where permitted by law).

You do not need to have all of this information to make a report. Reports can still be made even if some details are unknown.

How you can make a report

You can make a report in any of the following ways:

- in writing
- verbally (by phone or in a meeting), or
- anonymously through Your Call.

7. What happens after you make a report?

How disclosures are handled

Once GDN receives a disclosure, the following steps will usually apply:

- receipt of the disclosure is acknowledged (unless the report is anonymous)
- an initial assessment is undertaken to determine whether the matter is a Reportable Matter
- further information may be requested, where appropriate
- a decision is made about whether an investigation is required
- an investigator may be appointed, if appropriate
- interviews and evidence gathering are conducted
- findings are made based on the balance of probabilities
- outcomes are determined, which may include corrective or disciplinary action, and
- updates are provided, subject to confidentiality and legal requirements.

Each disclosure is assessed on its own circumstances, and not all disclosures will require a formal investigation.

Updates and feedback

Where practicable and appropriate, GDN will:

- acknowledge receipt of your disclosure
- provide updates on the progress of the matter, and
- inform you of the outcome, to the extent permitted by law and confidentiality obligations.

The level of detail that can be shared may be limited to protect privacy, confidentiality and the integrity of any investigation.

Anonymous reports

If your disclosure is anonymous, updates can only be provided if you continue to communicate through Your Call's secure communication portal or another agreed anonymous channel.

8. Support during the process

Support available

If you are an Eligible Person who makes a disclosure on reasonable grounds, GDN will take steps to support you during the process. This may include:

- access to available support services, such as the Employee Assistance Program (EAP)
- reasonable adjustments to work arrangements, where appropriate
- support to manage concerns about victimisation.

Requesting support

You can request support at any time during the process. Support needs may change, and requests will be considered on a case-by-case basis.

How protections apply during the whistleblowing process

During the handling of a disclosure, GDN applies the protections set out in the Whistleblowing Policy.

In practice, this means that throughout the process GDN will:

- take steps to protect the identity of the person making the disclosure, in line with confidentiality obligations
- take reasonable steps to reduce the risk of detriment or victimisation
- handle information relating to the disclosure securely and limit access to authorised personnel only, and
- apply appropriate safeguards to support people involved in the process, including where concerns about wellbeing or victimisation are raised.

The way these protections are applied may vary depending on the nature of the disclosure and the circumstances of the matter.

Conduct expectations during the whistleblowing process

9. Confidentiality

Everyone involved in receiving, assessing or investigating a disclosure is expected to maintain confidentiality during the whistleblowing process.

This includes:

- not disclosing the identity of a person who has made a disclosure, and
- not sharing information that could reasonably lead to that person being identified,
- except where disclosure is permitted or required by law.

Confidentiality requirements may limit the level of detail that can be shared in updates or outcomes.

10. Victimisation

Victimisation is not tolerated during the whistleblowing process.

Victimisation may include behaviour such as dismissal, discrimination, harassment, intimidation, harm or other detrimental treatment because a person has made, or is believed to have made, a disclosure.

If you believe you are experiencing, or are at risk of, victimisation in connection with a disclosure, you should raise this as soon as possible with Your Call or a Responsible Person. Concerns about victimisation will be treated seriously and addressed as part of the whistleblowing process.

11. Malicious or knowingly false reports

GDN expects disclosures to be made honestly and on reasonable grounds.

If it is determined that a report was made knowingly false or with malicious intent, this may be treated as a separate matter and may result in disciplinary action.

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

12. What happens if issues arise during the process

Breaches of this Procedure

If issues arise during the whistleblowing process, including concerns that this Procedure has not been followed appropriately, those concerns may be raised with a Responsible Person or through Your Call.

Any breach of this Procedure may result in corrective action being taken, and in some cases disciplinary action, depending on the nature and seriousness of the issue.

13. Related Documents

- GDN Whistleblowing Policy
- GDN Grievance and Complaints Process