Australian Red Cross

Policy

Policy Name: **Whistleblower Policy**

Approver: Board

Owner: CEO

Lead: Chief Legal Officer

Effective Date: 24 October 2025

Next Review Date: 2026

1 Purpose

(a) Australian Red Cross Society (**Australian Red Cross**) is comprised of two operating divisions: the Australian Red Cross Humanitarian division (**Humanitarian division**) and Australian Red Cross Lifeblood (**Lifeblood**). Australian Red Cross is committed to the highest standards of conduct and ethical behaviour and promotes quality care and safety in the delivery of all our services and activities.

(b) Australian Red Cross promotes a speak up culture and encourages individuals to make disclosures without fear of persecution, retribution and personal detriment.

(c) Any person with reasonable grounds to suspect illegal activity and other wrongdoing is encouraged to make a disclosure in accordance with the applicable policy.

(d) This policy and related processes ensure that eligible disclosures are acknowledged, assessed, managed and responded to in a fair, transparent, accessible, safe, culturally safe and timely manner.

(e) Information received by Australian Red Cross also helps to contribute to the continuous improvement of our services and activities.

2 Scope and Audience

(a) This policy applies to both operating divisions of Australian Red Cross, and to all current and former Australian Red Cross People and any other person detailed in 3.2.

(b) This policy provides a framework for what is known as an "eligible disclosure". This policy describes how eligible disclosures will be managed by Australian Red Cross.

Notes*:*

(i) For details on how to make a complaint or provide feedback in relation to Australian Red Cross humanitarian services or activities, please refer to the Feedback and Complaints (Products, Programs, Activities or Services) Policy.

(ii) For details on how to make a complaint or provide feedback in relation to Lifeblood, please refer to Lifeblood Whistleblower Guide.

(iii) For details on raising a personal work-related grievance (beyond the scope of any reportable matter), Australian Red Cross People should refer to the relevant Grievance Policy.

(iv) In accordance with the Australian Red Cross' "no wrong door" approach, where a disclosure does not meet the requirements of this policy, the disclosure will be handled in accordance with the relevant Australian Red Cross policy.

3 Policy

3.1 What is an eligible disclosure?

To be eligible for whistleblower protection, the disclosure must:

(a) be **made by an eligible person** as described in 3.2; and

(b) **made to an eligible recipient** as described in 3.3; and

(c) **relate to a reportable matter** as described in 3.4.

3.2 Who can make a disclosure?

The following individuals can make a disclosure under this policy:

(a) any current or former Australian Red Cross Person (employee, volunteer or member);

(b) a contractor, supplier or consultant to Australian Red Cross (including an employee);

(c) a relative or dependent of a person described above; or

(d) in the instance that a matter relates to our Aged Care services, in addition to the individuals listed above care recipients and their families, carers or advocates.

3.3 Who can receive a disclosure?

Disclosures may be made (anonymously or not) in person, by phone, post or email to:

(a) Stopline

Phone: 1300 30 45 50 if within AUSTRALIA

Post: Australian Red Cross, c/o Stopline, PO Box 403, Diamond Creek, Victoria 3089 Australia

For humanitarian services

Email: redcross@stopline.com.au
Web: redcross.stoplinereport.com

For Lifeblood

Email: redcrosslifeblood@stopline.com.au
Web: redcrosslifeblood.stoplinereport.com

Note: *Australian Red Cross encourages disclosures to be made to Stopline. Stopline assists Australian Red Cross to identify and address disclosures in a timely and confidential manner.*

Stopline is Australian Red Cross' whistleblower hotline run by an external and independent third party. Translation services can be requested. Australian Red Cross adopts a 'no wrong door' approach and will ensure that any disclosure is triaged to appropriate officers under this policy.

(b) If you choose not to use Stopline, you may also make a disclosure to any one of the following:

(i) in relation to Australian Red Cross Humanitarian division:

(A) the Whistleblower Protection Officer (Chief Legal Officer);

Note: *The Whistleblower Protection Officer can be contacted by email to whistleblower@redcross.org.au or by phone to +61 3 8327 6901.*

(B) the CEO, Chief People & Culture Officer or any other Executive;

Note*: Details of the current CEO, Chief People & Culture Officer and Executives can be found at redcross.org.au/governance/management/.*

(ii) in relation to Lifeblood, the Protected Disclosure Officer or Regional Contacts. Depending upon the nature of a report, the Regional Contacts will report details to the General Counsel, Executive Director People and Culture and/or Chief Financial Officer.

Note*: Details of the Protected Disclosure Officers and Regional Contacts are listed in the definitions below.*

(iii) in relation to **either** the Australian Red Cross Humanitarian division or Lifeblood:

(A) the Board Chair of Australian Red Cross, any Board Member of Australian Red Cross, the Society Secretary of Australian Red Cross or any Board Member of Lifeblood.

Notes*:*

Details of the Australian Red Cross Society Secretary, Board Chair and Board Members can be found at redcross.org.au/governance/board/. The Australian Red

Cross Society Secretary and Board can be contacted by email to SocietySecretary@redcross.org.au.

Details of the Lifeblood Board Members can be found at lifeblood.com.au/about/our-people/lifeblood-board-and-executive. The Lifeblood Board can be contacted by email at lifebloodsecretary@lifeblood.org.au.

(B) an internal or external auditor.

(iv) In the instance that a matter relates to our Aged Care services, in addition to all others listed above:

(A) an aged care worker (employees, volunteers, contractors) of Australian Red Cross; or

(B) the Director, NSW & Nationwide Program Operations.

3.4 What is a reportable matter?

Reportable matters are matters that relate to Australian Red Cross and you have reasonable grounds to suspect is:

(a) dishonest, fraudulent or corrupt;

(b) improper, such as a substantial misuse or abuse of Australian Red Cross resources or conduct which involves substantial risk to public health or safety or the environment;

(c) illegal or in breach of Commonwealth, state or territory legislation (including local authority laws);

(d) a wilful disregard for the safety of others in the workplace including unsafe work practices; or

(e) any other conduct which may cause financial or non-financial loss to Australian Red Cross or be otherwise detrimental to the interests of Australian Red Cross or its beneficiaries.

(f) in relation to our Aged Care services, a breach of the Aged Care Act 2024 (Cth), including, breaches of care obligations or legal requirements; or serious misconduct, abuse, neglect or endangerment of a person receiving Aged Care services.

***Examples** of a reportable matter include:*

(i) engaging in or threatening to engage in detrimental conduct against a person who has made a

(ii) disclosure or is believed or suspected to have made, or be planning to make, a disclosure;

(iii) fraudulent activity, such as money laundering, misappropriation of funds, misuse or abuse of resources, terrorist financing, offering or accepting a bribe;

(iv) corrupt conduct, such as acting contrary to the interests of Australian Red Cross and/or abusing a position of trust in order to achieve personal gain or advantage for another person or entity;

(v) modern slavery, such as human trafficking, forced labour and slavery-like practices; and

(vi) failure to meet responsibilities to Aged Care recipients further to the Aged Care Code of Conduct, Statement of Rights, Feedback and Complaints Policy or this Whistleblower Policy.

3.5 Can I make a disclosure to an external organisation?

(a) The policy does not prevent an individual from making a disclosure to a relevant external regulator, such as the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**), the Australian Taxation Office (**ATO**), the Australian Federal Police (**AFP**) or a legal practitioner for the purpose of getting advice about the operation of Part 9.4AAA of the *Corporations Act 2001* (Cth).

(b) The policy does not prevent an individual from making a disclosure about our Aged Care services to the Aged Care Commissioner, a member of staff of the Aged Care Quality and Safety Commission, the System Governor (being the Secretary of the Department of Health, Disability and Ageing), an official of the Department of Health, Disability and Ageing, or an independent aged care advocate.

(c) A disclosure to a journalist or parliamentarian under certain circumstances of emergency or a public interest disclosure may also qualify for protection. Note that the whistleblower protections do not apply if the disclosure to the public is made in another way. For further information regarding public interest disclosures and emergency disclosures, please refer to the ASIC website. You may wish to seek independent legal advice prior to making an emergency or public interest disclosure.

3.6 Can I make a disclosure anonymously?

When making a disclosure you can request for yourself, or any other individual named in the request, to remain anonymous (that is, that the name and identity, is not provided as part of the disclosure). You can also refuse to answer any questions that you feel could reveal your identity at any time, including during follow up conversations. Where you choose to remain anonymous, Australian Red Cross may be limited in the steps it can take to investigate.

Notes:

(i) The best way for Australian Red Cross to manage an anonymous disclosure is via Stopline. You can choose to either remain anonymous to both Stopline and Australian Red Cross (in which case we will be unable to contact you) or to Australian Red Cross only (which means we will still be able to contact you via Stopline if needed).

(ii) You can also request to remain anonymous if you make a disclosure to another eligible recipient. Australian Red Cross will take such steps that are reasonable in the circumstances to preserve the anonymity of individuals.

(iii) There are legal circumstances when Australian Red Cross may need to disclose a person's name (for example, when it is necessary to lessen or prevent a serious threat to the health, safety or wellbeing of an individual or of others).

3.7 Maintaining confidentiality of identity

(a) Regardless of whether the disclosure has been made anonymously or not, upon receiving an eligible disclosure, Australian Red Cross will not disclose your identity, or information that is likely to lead to your identification, unless authorised and/or required under legislation.

Notes*: Authorised circumstances can include:*

(i) if you elect to have the disclosure dealt with as a complaint or feedback;

(ii) if you agree or consent to the disclosure;

(iii) for the purposes of Australian Red Cross obtaining legal advice;

(iv) for necessary confidential triage and administration by responsible staff and referral to Whistleblower Protection Officer or Protected Disclosure Officer;

(v) to provide information to law enforcement, a regulator or other government authority; and

(vi) if the matter relates to our Aged Care services, to provide information to the Aged Care Commissioner or a member of the staff of the Aged Care Quality and Safety Commission; the System Governor (being the Secretary of the Department of Health, Disability and Ageing), or the Inspector-General of Aged Care.

(b) Australian Red Cross will not breach this requirement if it takes all reasonable steps to reduce the risk that you (the discloser) will be identified. For example, if you do not consent to your identity being disclosed:

(i) the information you disclose (but not your identity) may be disclosed to others, for example, for the purposes of investigating the conduct; and

(ii) all reasonable steps must be taken to reduce the risk of revealing your identity. These steps might include, for example, redacting certain documents and using pseudonyms.

(c) A breach of this requirement may attract a penalty for Australian Red Cross.

(d) If you have any concerns, you should discuss this with the individual receiving your disclosure, the Whistleblower Protection Officer or where the disclosure relates to Lifeblood, to a Protected Disclosure Officer.

(e) If you have concerns related to a breach of confidentiality, you can also choose to lodge a complaint with an external regulator listed at 3.5.

3.8 What protections will I receive if I make an eligible disclosure?

(a) Australian Red Cross:

(i) is committed to protecting individuals who qualify for whistleblower protections under this policy. You will not be subject to any civil, criminal or administrative liability for making an eligible disclosure.

(ii) must not subject you to any detrimental action, or threats of detrimental action, because of the belief that you have made, may have made, or intend to make, an eligible disclosure.

(iii) is prohibited from causing detriment to another individual or another entity that employs or is associated with you.

***Note**: Detrimental action includes physical or psychological harm, disciplinary action in relation to your employment (including dismissal or demotion), reputational damage, property damage, or discrimination, harassment or intimidation.*

Detrimental action does not include reasonable administrative action to protect you from detriment, or actions undertaken to manage unsatisfactory work performance.

(b) You may also receive the above protections if you make a disclosure to a legal practitioner, external regulator or make a public interest and emergency disclosure in accordance with the Corporations Act.

(c) If you (as the discloser), or any other employee or person:

(i) suffer loss, damage or injury because of a disclosure; and

(ii) Australian Red Cross failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct,

you may seek compensation and other remedies through the court. You may also seek independent legal advice.

(d) The above protections do not grant immunity for any misconduct you (as the discloser) may have engaged in that has become known as a result of the disclosure.

(e) A breach of this requirement may attract a penalty for Australian Red Cross.

(f) If you have made an eligible disclosure and have reasonable grounds to believe that retaliatory action has been taken or you believe you have otherwise suffered an unlawful detriment, you may discuss this with the individual receiving your disclosure or the Whistleblower Protection Officer or where the disclosure relates to Lifeblood, to the Protected Disclosure Officer. You may also choose to lodge a separate whistleblower disclosure via an available mechanism.

***Note:** For the Humanitarian division, the Whistleblower Protection Officer can be contacted by email to whistleblower@redcross.org.au or by phone to +61 3 8327 6901.*

For Lifeblood, details of the Protected Disclosure Officers are listed in the definitions below.

(g) If you (as the discloser) are not satisfied with the way your disclosure has been managed, you may also choose to lodge a complaint with an external regulator.

3.9 What protections will the subject of the disclosure and other parties to the disclosure receive?

(a) Australian Red Cross commits to fair treatment and the application of procedural fairness for any person who is accused of wrongdoing in an eligible disclosure.

(b) Although every eligible disclosure will be dealt with on a case-by-case basis, the process may include providing:

(i) notice and details of any allegations that have been made against the individual that are not trivial and that have been made on reasonable grounds;

(ii) a reasonable opportunity to respond to the allegations within a reasonable time frame;

(iii) subject to confidentiality considerations, notice that the investigation has been completed; and

(iv) whether any allegation against them has been found to be substantiated or not substantiated, to the extent permitted by law.

3.10 Support arrangements

Australian Red Cross:

(a) will as soon as practicable after an eligible disclosure is made:

(i) take steps to support the discloser and any other individual that might be caused or threatened with detriment because of the disclosure.

(ii) provide support arrangements for a person who is the subject of an eligible disclosure.

(b) may offer the following support arrangements:

(i) referral to a counsellor (Employee Assistance Program (if appropriate) or other support);

(ii) an Australian Red Cross contact person who may:

(A) keep the person informed about the general progress of the investigation;

(B) check in on the person's welfare from time to time;

(C) discuss the process and answer any questions the person might have; and

(D) listen to and pass on any concerns raised about the process to the Whistleblower Protection Officer or where the disclosure related to Lifeblood to the Protected Disclosure Officer.

(c) will give consideration to any other reasonable requests for support made by a person mentioned above.

3.11 How will Australian Red Cross manage or investigate an eligible disclosure?

(a) All disclosures will be handled in a fair, transparent and timely manner in accordance with procedural fairness.

> ***Note**: Procedural fairness includes:*
>
> *(i) Making impartial, evidence-based decisions without bias.*
>
> *(ii) Giving all parties an opportunity to respond.*
>
> *(iii) Being transparent with the discloser, and providing updates, when necessary.*
>
> *(iv) Providing reasons for decisions.*
>
> *(v) Ensuring timeliness of response.*

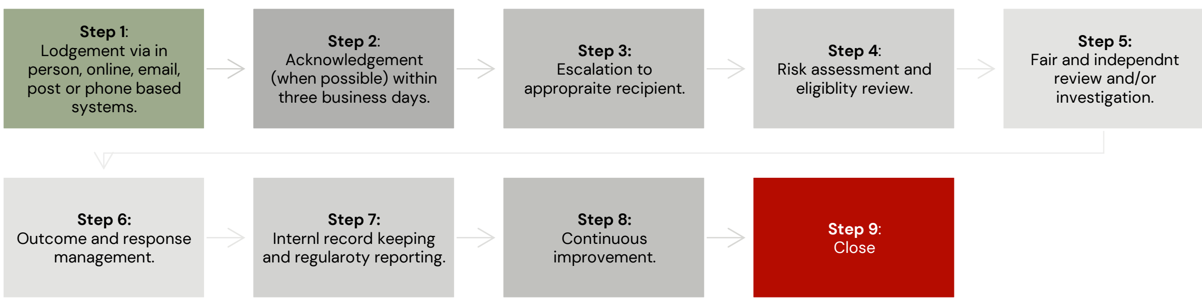

Figure 1 – High level Whistleblower workflow

(b) Preliminary assessment

Subject to confidentiality requirements, all disclosures will be referred to the Whistleblower Protection Officer or their delegate, or where the disclosure relates to Lifeblood to a Protected Disclosure Officer or their delegate. If the disclosure relates to the Whistleblower Protection Officer or the Protected Disclosure Officer, the matter may be referred to the relevant CEO.

Following receipt of a disclosure, the Whistleblower Protection Officer or the Protected Disclosure Officer will:

(i) acknowledge receipt of the disclosure (when possible) as soon as practicable but no longer than three business days;

(ii) complete a risk assessment that considers steps to best ensure the safety of all parties to the disclosure;

(iii) make a preliminary assessment as to whether the information received is an eligible disclosure under this policy; and

(iv) notify you (the discloser) as to whether the information received meets the requirements of an eligible whistleblower disclosure under this policy. If the disclosure is not eligible, you may be informed that the information will be considered under another Australian Red Cross or Lifeblood policy.

(c) Investigation

(i) If the disclosure is determined to be an eligible disclosure, you (the discloser) will be advised of the protections and support mechanisms that are available to you.

(ii) The Whistleblower Protection Officer or the Protected Disclosure Officer will also consider whether to commence an investigation, and if an investigation is required, the Whistleblower Protection Officer or the Protected Disclosure Officer will:

(A) determine the nature and scope of the investigation, including whether the investigation is formal or informal;

(B) determine who will conduct the investigation, including whether an external investigator should be engaged;

(C) inform you of the steps that may be taken to investigate the eligible disclosure. You may be asked for further information or relevant documents (if necessary) to support the disclosure. Witnesses or persons named in the disclosure may also be interviewed and related documents may be collected; and

(D) determine the anticipated time frame for the investigation having regard to the nature, scope and complexity of the information received, and number and availability of witnesses.

Note: *An investigation may not be possible if the disclosure is received anonymously; Australian Red Cross is not able to obtain the eligible person's consent; there is not enough information to support an investigation; or the risks identified in the risk assessment cannot be sufficiently managed to ensure the safety of all relevant parties.*

(iii) In any investigation, findings of fact are generally made by the investigator on the balance of probabilities.

(d) Outcome

(i) The length of time it will take to deal with an eligible disclosure will depend on all the circumstances. Australian Red Cross aims to deal with all eligible disclosures as expeditiously as practicable in the circumstances.

(ii) Disciplinary action may be taken if allegations of wrongdoing are substantiated.

(iii) Wherever possible, you (the discloser) will be advised on the outcome of the investigation process and whether the disclosure made was substantiated or not.

(iv) In some circumstances, where external referral is required (for example, if information is referred to the Police due to alleged criminal conduct) Australian Red Cross may not be able to keep you informed on the progress or outcome of the investigation.

Note: *If you make an eligible disclosure on an anonymous basis with Stopline and would like an update, you will need to contact Stopline to request an update on the progress of your eligible disclosure.*

3.12 Obligations of parties involved in whistleblower matter

All persons involved in an eligible whistleblower disclosure (including: a person who made the disclosure; a person who is a witness in connection with a disclosure; and a person who is involved in the investigation process) are under a strict duty to maintain confidentiality in accordance with this policy in respect of the disclosure, any investigation process and any investigation outcome.

Note: *If you wish to discuss or obtain an exception to confidentiality, you must raise this with the Whistleblower Protection Officer or where the disclosure relates to Lifeblood, to the Protected Disclosure Officer. Intentionally making a false disclosure, or making a disclosure without a proper and reasonable basis, is a serious matter and, depending on the circumstances, may result in disciplinary action against the discloser.*

3.13 What if I need more information?

If you wish to seek more information about the whistleblower process before making a disclosure, you can contact the Whistleblower Protection Officer or if the matter relates to Lifeblood, you can contact Lifeblood's General Counsel. You may also wish to seek independent legal advice.

Note: *The Whistleblower Protection Officer can be contacted by email to whistleblower@redcross.org.au or by phone to +61 3 8327 6901.*

Lifeblood's General Counsel can be contacted by email to whistleblower@redcrossblood.org.au or by phone to +6 13 9863 1607

3.14 Reporting

(a) All eligible disclosures are reported (in a deidentified and confidential manner) to the Australian Red Cross or/and Lifeblood CEO, Australian Red Cross Board and any Board Committee as applicable.

Note: *Information in relation to an eligible disclosure will be kept securely and confidentially by the Whistleblower Protection Officer, Protected Disclosure Officer and Stopline. Where information needs to be shared within Australian Red Cross (when required under this policy) steps will be taken to protect the identity, gender identity and other identifying information of the discloser.*

(b) Once Australian Red Cross is aware of an eligible disclosure, at any stage Australian Red Cross may choose (or may be required by law) to report the concern to a relevant government authority or regulator.

(c) Australian Red Cross may also report to the International Federation of Red Cross and Red Crescent Societies (**IFRC**), if appropriate to do so.

3.15 Training to potential recipients of a disclosure

Australian Red Cross will provide training to all relevant Australian Red Cross People in relation to the contents of this policy.

3.16 Breach of this Policy

Disciplinary action may be taken (including termination of employment or cancellation of membership) if there is any breach of this policy.

3.17 Availability of this Policy

This policy will be made available at www.redcross.org.au and www.lifeblood.com.au.

4 Other

4.1 Definitions

Term	Definition
Aged Care services	Services provided by Australian Red Cross in accordance with the *Aged Care Act 2024* (Cth).
Australian Red Cross	means the Australian Red Cross Society including Lifeblood.
Australian Red Cross People	As the context requires, all employees, volunteers and members of Australian Red Cross Society (including Lifeblood).
Eligible disclosure	To be an eligible disclosure, the disclosure must: (1) be made by an eligible person as described in 3.2; and (2) made to an eligible recipient as described in 3.3; and (3) relate to a reportable matter as described in 3.4.
Personal work-related grievance	A grievance about any matter in relation to the discloser's employment, or former employment with Australian Red Cross, having (or tending to have) implications for them personally, and not otherwise covered under 3.4 such as: (1) an interpersonal conflict with any other Australian Red Cross People; (2) concerns related to being bullied, harassed or discriminated against by another person or otherwise treated unfairly; (3) disagreement with a decision relating to the terms and conditions of engagement; (4) disagreement with a decision to suspend or terminate engagement, or otherwise discipline; (5) disagreement with a decision regarding engagement, transfer, promotion, work allocation or remuneration; (6) concerns related to being underpaid or expectations of higher incentive payment; (7) disagreement with a performance review or a performance improvement plan; (8) the effect of an organisational restructure on their role; or (9) dissatisfaction with their workload or working hours.
Protected Disclosure Officer	Lifeblood appoints and maintains appropriate qualified Protected Disclosure Officers, who are accessible to all staff. These staff are: (1) General Counsel (2) Chief Financial Officer (3) Executive Director, People and Culture Other persons appointed by the Chief Executive and notified to staff from time to time. ***Note:*** *Lifeblood's General Counsel can be contacted by email at GeneralCounsel@redcrossblood.org.au or by phone to +6 13 9863 1607* *Protected Disclosure Officers can be contacted by email at whistleblower@redcrossblood.org.au.*

Term	Definition
Regional Contacts	Regional Contacts of Lifeblood are: (1) Executive Directors (2) Manufacturing Managers (3) Donor Services Managers (4) People & Culture Business Partners ***Note:*** *Regional Contacts can be contacted by email, details can be found on The Drop.*
Whistleblower Protection Officer	For humanitarian services, a nominated employee of Australian Red Cross who receives, assesses and manages disclosures by whistleblowers. ***Note:*** *At the date of this policy, this role is held by the Chief Legal Officer who can be contacted by Email to whistleblower@redcross.org.au or by Phone to +61 3 8327 6901.*

4.2 Related Documents

(a) Australian Red Cross Code of Conduct (Our Code).

(b) Australian Red Cross Feedback and Complaints Policy.

(c) Australian Red Cross Fraud Prevention and Control Policy.

(d) Australian Red Cross Grievance Policy.

(e) Australian Red Cross Interests, Conflicts, Gifts and Hospitality Policy.

(f) Australian Red Cross Prevention of Sexual Exploitation, Abuse and Harassment Policy.

(g) Australian Red Cross Privacy Policy.

(h) Australian Red Cross Respect (Bullying, Discrimination and Harassment Prevention) Policy.

(i) Lifeblood Code of Conduct.

(j) Lifeblood Fraud and Corruption Policy.

(k) Lifeblood Managing Employee Grievance Policy.

4.3 Related legislation / standards

(a) *Aged Care Act 2024* (Cth).

(b) *Corporations Act 2001* (Cth).

(c) *Privacy Act 1988* (Cth).

(d) IFRC Constitution.

(e) Statement on Integrity of the International Red Cross and Red Crescent Movement (CD/19/R2).

(a) IFRC Policy on the Protection of Integrity of National Societies and Organs of the International Federation.

4.4 Version History

Version	Date of Approval	Summary of changes made
0.0	February 2017	
1.0	May 2019	
2.0	September 2021	

Version	Date of Approval	Summary of changes made
3.0	24 October 2025	• Amendments made to comply with legislative requirements under the *Aged Care Act 2024* (Cth). • Updated processes to reflect better practice. • Amendments made to align with existing organisational structures and roles. • Combined with Lifeblood whistleblower policy to create a single overarching policy.