



**Russell Kennedy**  
Lawyers



## **WHISTLEBLOWER POLICY**

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**THE SOCIETY OF HOSPITAL  
PHARMACISTS OF AUSTRALIA  
ABN 54 004 553 806**

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## 1 INTRODUCTION

### 1.1 Whistleblower Policy

The Society of Hospital Pharmacists of Australia (ABN 54 004 553 806) (**Company**) promotes and supports a culture of good corporate governance and values a workplace culture with open communication regarding the Company's business practices.

Our Whistleblower Policy (**Policy**):

- (a) has been developed to align with our values to ensure that we observe the highest standards of corporate governance, risk management and integrity; and
- (b) has been implemented to ensure our stakeholders can report Disclosable Conduct safely, securely and with confidence that they will be protected and supported.

This Policy is available to officers and employees of the Company via the Company's website and intranet and in hard copy via emailing: [shpa@shpa.org.au](mailto:shpa@shpa.org.au).

Defined terms in this Policy have the meaning given in the Glossary (see section 8).

### 1.2 Associated policies and procedures

This Policy operates independently of the Company's other policies and procedures and applies only to reports of Disclosable Conduct.

Nothing in this Policy is intended to restrict you from disclosing Disclosable Conduct, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which the Company operates.

## 2 PURPOSE

This Policy aims to:

- (a) encourage Disclosers (see section 3) to report wrongdoing if they have reasonable grounds to suspect it concerns Disclosable Conduct (see section 4);
- (b) provide details about how (and to whom) a Discloser can make a report (see section 5);
- (c) provide details about how the Company will conduct investigations of reports of Disclosable Conduct (see section 6);
- (d) provide details (see section 7) on the protections available to Disclosers, and how the Company will ensure fair treatment of employees specified in a report; and
- (e) fulfil the Company's obligations under, and promote the operation of, the Whistleblower Laws.

## 3 PERSONS TO WHOM THIS POLICY APPLIES

This Policy applies to those persons who are qualifying Disclosers.

Only a Discloser will qualify for protection as a whistleblower under the Whistleblower Laws (see section 7). A person who makes a report, but does not qualify as a Discloser, will not qualify for protection as a whistleblower under the Whistleblower Laws.

## **4 MATTERS TO WHICH THIS POLICY APPLIES**

### **4.1 Disclosable Conduct**

A Discloser is able to make a report regarding Disclosable Conduct (see definition in section 8).

Only reports of Disclosable Conduct will qualify for protection under the Whistleblower Laws (see section 7) and any reports that do not relate to Disclosable Conduct are not covered by this Policy and will not qualify for protection under the Whistleblower Laws. A Discloser can still qualify for protection even if their report of Disclosable Conduct turns out to be incorrect.

### **4.2 Examples of 'Disclosable Conduct'**

For guidance on what Disclosable Conduct is, examples are where the Company, or an officer or employee of the Company, has engaged in:

- (a) illegal conduct, such as theft, dealing in or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (b) fraud, money laundering or misappropriation of funds;
- (c) offering or accepting a bribe;
- (d) financial irregularities, including tax avoidance behaviour;
- (e) failure to comply with, or breach of, legal or regulatory requirements, including:
  - (1) an unsafe work-practice or behaviour that poses a serious risk to the health and safety of any person at the workplace;
  - (2) misuse of any grant monies and donations, including serious contraventions of conditions relating to the grant;
  - (3) misclaiming Government benefits such as JobKeeper subsidy;
- (f) engaging in, or threatening to engage in, detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure;
- (g) systemic failures within the Company, for example "in clinical governance"; or
- (h) any other conduct which may cause a material loss to the Company or be otherwise detrimental to the Company's interests.

### **4.3 Exclusion of personal work related grievances**

Generally, Disclosable Conduct does not include conduct that relates to personal work related grievances, being any matter in relation to the Discloser's own employment (or former employment) having (or tending to have) implications for the Discloser personally (but not relating to Disclosable Conduct), for example:

- (a) an interpersonal conflict between the Discloser and another employee;
- (b) a decision that does not involve a breach of workplace laws;
- (c) a decision in relation to the Discloser's engagement, transfer or promotion;
- (d) a decision relating to the Discloser's terms and conditions of engagement; or

- (e) a decision to suspend and terminate the Discloser's engagement, or otherwise to discipline the Discloser.

Any instances of such 'personal work related grievances' are expressly excluded from this Policy and will not qualify for protection under the Whistleblower Laws, and will be managed by the Company under its workplace policies (and should instead be raised with the Chief Executive Officer).

However, instances of 'personal work-related grievances' may still qualify as Disclosable Conduct if they also raise significant implications for the Company (for example if the Company's treatment of a Discloser breaks employment or other laws, or suggests systemic misconduct beyond the Discloser's own circumstances) or if the matter is a 'mixed' report that also covers Disclosable Conduct.

## 5 REPORTING DISCLOSABLE CONDUCT

### 5.1 Form of report

A report for Disclosable Conduct under this Policy can be made at any time (including out of normal business hours) either verbally or in writing. Reports should include supporting documentation, the grounds for making the report and details of all relevant facts.

### 5.2 Reasonable grounds and false claims

A report made under this Policy may have serious consequences, including potential damage to the personal reputation and career prospects of the person(s) who are the subject of allegations of wrongdoing. Therefore, in reporting Disclosable Conduct, a Discloser must have **reasonable grounds** to suspect that the matter/information falls within the definition of Disclosable Conduct.

Where it is shown that a person has knowingly made a false report, or makes a report without reasonable grounds as to truth or accuracy, that false report is considered a serious breach of Company policy and the person responsible may be subject to appropriate disciplinary action.

### 5.3 Anonymity

When making a report, the Discloser can choose to do so anonymously and may request that their identity be kept confidential and claim details 'de-identified' (and may ask that this apply during and after any investigation). Any report of Disclosable Conduct that is made anonymously will still be protected under the Whistleblower Laws. A Discloser who wishes to remain anonymous should maintain ongoing two-way communication with the Company, so the Company can ask follow-up questions or provide feedback. See section 7.2 for further details.

### 5.4 Who to make a report to

Reports of Disclosable Conduct must be made directly to any of the following persons in order to qualify for protection under the Whistleblower Laws (and the WPO can be contacted in relation to any queries on the reporting process under this Policy):

#### (a) Internal Reporting

The Company encourages all Disclosers to consider making an internal report in the first instance, as this will enable the Company to identify and address any wrongdoing as early as possible. In order to make an internal report of Disclosable Conduct, the Discloser should contact an Eligible Recipient. Contact details of Eligible Recipients are available on the Company's intranet/website or upon request from the WPO.

Any report of alleged Disclosable Conduct received by an Eligible Recipient must be promptly forwarded to the WPO and Eligible Recipients will only provide the Discloser's identity to the WPO where the Discloser has consented.

(b) **External Reporting**

Although the Company's preference is that a Discloser first contact an internal Eligible Recipient, alternatively, the Discloser may also choose to make a report of Disclosable Conduct directly to an external Prescribed Body.

Details of how to contact a Prescribed Body are included in the definition of Prescribed Body.

(c) **Public interest and emergency disclosures**

If an external report is made to a Prescribed Body and:

- (1) after 90 days, the Discloser has reasonable grounds to believe that the Prescribed Body is not taking action to address the matters reported, the Discloser has reasonable grounds to believe that making a further disclosure of the information would be in the public interest, and the Discloser has provided the Prescribed Body with written notification that it intends to make a public interest disclosure; or
- (2) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment and the Discloser has provided the Prescribed Body with written notification that it intends to make an emergency disclosure,

the Disclosure can make a 'public interest disclosure' or an 'emergency disclosure' (as applicable) to a Member of Parliament or a journalist (and such a disclosure will qualify for protection under the Whistleblower Laws).

The Company strongly recommends that a Discloser should contact the WPO or an independent legal adviser to ensure they understand the criteria for making a public interest or emergency disclosure.

(d) **Reporting to a legal practitioner**

A Discloser may make a report to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of this Policy or the Whistleblower Laws in general.

## 5.5 **Assessment of a report**

As stated above, any report of alleged Disclosable Conduct received by an Eligible Recipient must be promptly forwarded to the WPO (and Eligible Recipients will only provide the Discloser's identity to the WPO where the Discloser has consented to this). The WPO (in conjunction with other relevant independent Company representatives, where applicable/required) will then review the report to assess whether it falls within the terms of this Policy, with:

- (a) qualifying reports of Disclosable Conduct being referred by the WPO to the WIO for investigation (see section 6); and
- (b) non-qualifying (or baseless) reports requiring no investigation by the WIO, in which case the WPO will notify the Discloser and inform them of this outcome (however,

where relevant, non-qualifying reports may be investigated by the Company outside the terms of this Policy).

The WPO will provide the CEO and the Board with an update on the outcome of all assessments made.

## **6 INVESTIGATIONS OF DISCLOSABLE CONDUCT**

Set out below is the investigations procedure for a whistleblower report under this Policy.

It is noted that this procedure applies only to reports of Disclosable Conduct under this Policy, and that the Company's *complaints management procedure* applies and operates separately to this.

### **6.1 Whistleblower Investigations Officer**

Where a report is made under this Policy and it is determined that an investigation is warranted (see section 5.5), the WIO will carry out (or supervise) the investigation. The WIO may be a designated person appointed as WIO from time-to-time, an employee of the Company, or an external person. Where necessary, the WIO may use an external investigator or expert to conduct or assist with an investigation. The WIO acts independently of the WPO and the responsibilities of these roles do not reside with one person.

SHPA Board nominate the WIO to be the CEO in the first instance or when an investigation relates to the Company's CEO, WPO, WIO or a director, it will be directed to the President of the Board who will determine who the investigator will be.

### **6.2 Investigation procedure and confidentiality**

Where a formal investigation is required, the Company and the WIO will take all reasonable steps to ensure that the investigation is conducted fairly, independently, without bias, in a timely manner and in accordance with the principles of natural justice. It is intended that investigations will be conducted over a six week period, however the timing of any investigation process may vary depending on the nature of the disclosure.

All reasonable efforts will be made to preserve the confidentiality of the investigation and the identity of the parties involved, including the anonymity of the Discloser where this has been requested. However, the Company may not be able to undertake an investigation (or an investigation may be limited) if it is not able to contact the Discloser or if the report is made anonymously.

Without the Discloser's consent, the Company cannot disclose information that is contained in a disclosure as part of its investigation process, unless:

- (a) the information does not include the Discloser's identity;
- (b) the Company removes information relating to the Discloser's identity or other information likely to lead to identification; and
- (c) it is reasonably necessary for investigating the issues raised in the disclosure.

### **6.3 Persons the subject of a claim**

The Company recognises that individuals against whom an allegation is made must also be supported during the investigation process. Accordingly, the Company and the WIO will take all reasonable steps to treat any person who is the subject of a report of alleged Disclosable Conduct fairly, including by:

- (a) informing that person of the substance of the allegations that are the subject of the investigation;
- (b) offering that person a right to submit a response to the claim; and
- (c) informing that person about the substance of any adverse conclusion at the end of the investigation process.

#### 6.4 Reporting

At the end of an investigation, the WIO must provide the WPO, CEO and Board with a written report setting out the findings of the allegations and a summary of the evidence (whilst preserving confidentiality/anonymity as required, for example where the report relates to the CEO it will only be provided to the Board). Findings may be that an allegation of Disclosable Conduct is fully substantiated; partially substantiated, not able to be substantiated, or disproven.

The CEO (or their delegate) will take appropriate action in relation to the investigator's report, which may include requiring further investigations, recommending disciplinary action, referring the matter to the Board for determination and/or notifying regulatory bodies. Any findings that relate to criminal activity will be reported to the police and/or regulators.

#### 6.5 Updates to Discloser

The Discloser will be provided with periodic updates in relation to the status of any investigation (including that one has commenced), at such intervals and in such form to be determined by the WIO (including, if necessary, through anonymous channels). However, it is envisaged that updates will be provided quarterly and verbally if appropriate. To the extent permitted, the Discloser will be informed of the final findings of the investigation, however, they will not be entitled to receive a copy of the formal report.

#### 6.6 Review of investigation findings

If the Discloser is not satisfied with the outcome of an investigation, they may request to the WPO that a review be conducted (or lodge a complaint with a regulator, such as ASIC or APRA). If the WPO determines that a review should be conducted, it will be conducted by an investigator who was not involved in the handling and investigation of the original disclosure (and will otherwise be conducted in the same manner as set out in this section 6). However, the Company is not obliged to reopen an investigation and it can conclude a review if it finds that the original investigation was conducted properly, or new information is either not available or would not change the findings of the original investigation.

### 7 PROTECTION OF WHISTLEBLOWERS

#### 7.1 Role of Whistleblower Protection Officer

The Company has appointed a WPO who will safeguard the interests of Disclosers making reports under this Policy and will ensure the integrity of the reporting mechanism. The WPO is responsible for taking steps to safeguard the interests of the Discloser, including:

- (a) maintaining the privacy and confidentiality of the Discloser, including ensuring that communications and documentation are appropriately secured;
- (b) ensuring that all valid claims are taken seriously and investigated fairly;
- (c) keeping the Discloser informed of developments, including progress and outcome of the investigation;



- (d) upon receiving a Disclosure, making an assessment of the risk to the Discloser of any detrimental treatment occurring (see section 7.4), and implementing any necessary procedures to appropriately address this risk; and
- (e) monitoring the effectiveness of protections offered under this Policy.

The WPO can be contacted in relation to any queries on the reporting and investigation processes under this Policy.

The SHPA Board nominate the Chair of the Finance and Risk Management Committee as the WPO in the first instance, then the President if the matter involves that person.

## 7.2 Anonymity of a disclosure

As stated in section 5.3, a report of Disclosable Conduct can be made anonymously. A Discloser:

- (a) can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised;
- (b) can refuse to answer questions that they feel could reveal their identity during follow-up conversations; or
- (c) may choose to adopt a pseudonym for the purposes of their disclosure, and not use their true name.

The Company and other persons involved in the investigations (including the WPO, WIO and Eligible Persons who receive a report of Disclosable Conduct), will not disclose the Discloser's identity or information that is likely to lead to identification unless the Discloser consents to the disclosure of their identity (or the disclosure of the Discloser's identity is required by law or to a legal practitioner). It is illegal for a person to identify a Discloser, or disclose information that is likely to lead to the identification of the Discloser, outside these exceptions.

If a Discloser considers that there has been a breach of confidentiality, they can choose to lodge a complaint with the Company or with a regulator, such as ASIC or APRA, for investigation.

## 7.3 Confidentiality

All reports made under this Policy will be confidential. However, when a report is investigated, it may be necessary to disclose the details of the allegations to key personnel of the Company, external persons involved in the investigation process (including the WIO), to the relevant law enforcement agencies and/or as otherwise required or authorised by law. In these contexts, the Company will ensure that all reasonable steps are taken to reduce the risk of the Discloser being identified without consent – for example, de-identifying names, locations and personal information.

All files and records created from an investigation will be handled confidentially and retained in secure files and any unauthorised release of information will be regarded as a breach of this Policy. Access to information in relation to reports of Disclosable Conduct will be limited only to those persons requiring access for the purposes of this Policy.

## 7.4 Protections against detrimental treatment

The Company is committed to protecting and respecting the rights of a Discloser and will not tolerate any victimisation, detrimental treatment or retaliatory action against a Discloser or a person who may make a claim under this Policy (or against their colleagues, associates, or

family). Any such treatment will be treated as serious misconduct by the Company and may result in disciplinary action.

For illustrative purposes, a Discloser must not be disadvantaged or victimised (by the Company or any of its employees or agents) by any of the following actions occurring because of their disclosure of Disclosable Conduct:

- (a) dismissal as employee;
- (b) harm or injury of an employee (including psychological harm);
- (c) alteration of an employee's position or duties to his or her disadvantage;
- (d) discrimination between an employee and other employees;
- (e) harassment or intimidation of a person;
- (f) damage to a person's property, reputation, business or financial position.

However, the Company notes that:

- administrative action that is reasonable to protect a Discloser from detriment (eg when the disclosure relates to wrongdoing in the Discloser's immediate work area) will not be considered to be detrimental conduct; and
- protecting a Discloser from detriment does not prevent the Company from managing a Discloser's unsatisfactory work performance in the normal course of the Company's performance management framework (or taking disciplinary action against them when they have engaged in misconduct).

Any Discloser who feels they been subjected to any behaviour that violates this Policy should immediately report such behaviour to the WPO, the CEO or their supervisor]. A Discloser may also seek independent legal advice or contact regulatory bodies, such as ASIC or APRA, if they believe they have suffered detriment.

## 7.5 Compensation

Any Discloser who is subjected to detrimental conduct may be entitled to compensation for loss, damage or injury suffered because of the conduct. It is the Discloser's responsibility to bring any such action for compensation and the Company strongly encourages anyone seeking to do so to obtain independent legal advice. A Discloser can seek compensation through a Court, or pursue other remedies (such as reinstating them to their original position or a comparable position, or an apology).

## 7.6 Protections against legal action

The Whistleblower Laws protect a Discloser against certain legal actions related to making a whistleblower disclosure, including criminal prosecution, civil litigation, or administrative action. If you are a Discloser, and consequently are the subject of an action for making a whistleblower disclosure, you may rely on this protection in your defence. However, this protection does not grant immunity to a person for any misconduct they were involved in that is revealed in the disclosure.

## 8 GLOSSARY

Term	Meaning
<b>APRA</b>	Australian Prudential Regulation Authority
<b>ASIC</b>	Australian Securities and Investments Commission
<b>ATO</b>	Australian Taxation Office
<b>Board</b>	the Company's board of directors.
<b>Disclosable Conduct</b>	<p>any matter/information that the Discloser has 'reasonable grounds' to suspect:</p> <p>(a) concerns misconduct or an 'improper state of affairs or circumstances' in relation to the Company;</p> <p>(b) indicates that the Company, or any of its officers or employees, has engaged in conduct that:</p> <ul style="list-style-type: none"> <li>• breaches the <i>Corporations Act 2001</i> (Cth), <i>Australian Securities and Investments Commission Act 2001</i> (Cth), <i>Banking Act 1959</i> (Cth), <i>Financial Sector (Collection of Data) Act 2001</i> (Cth), <i>Insurance Act 1973</i> (Cth), <i>Life Insurance Act 1995</i> (Cth), <i>National Consumer Credit Protection Act 2009</i> (Cth) or <i>Superannuation Industry (Supervision) Act 1993</i> (Cth) (or regulations made under those laws);</li> <li>• constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;</li> <li>• represents a danger to the public or the financial system; or</li> <li>• is otherwise prescribed by regulation; or</li> </ul> <p>(c) may be of a serious enough nature to warrant disclosure even though it may not be in breach of particular laws (for example conduct that, whilst not unlawful, may indicate a 'systemic issue'),</p> <p>but excludes 'personal workplace grievances' (as specified in section 4.3).</p> <p>See section 4.2 for examples of Disclosable Conduct.</p>
<b>Discloser</b>	<p>persons who are, or have been, any of the following:</p> <p>(a) 'officers' of the Company (including a director or secretary);</p> <p>(b) employees of the Company (including permanent, part time, fixed-term or temporary, interns, secondees, managers and directors);</p> <p>(c) suppliers of services or goods to the Company (whether paid or unpaid) including their employees (e.g. current and former contractors, consultants, service providers and business partners);</p> <p>(d) associates of the Company (for example a person whom</p>

Term	Meaning
	the Company acts in concert); or (e) a relative, dependant or spouse of any individual above.
<b>Eligible Recipient</b>	any of the following: (a) the WPO; (b) an 'officer' of the Company (including a director or secretary of the Company); (c) a 'senior manager' of the Company (including the CEO); (d) the Company's auditor (or a member of an audit team conducting an audit of the Company).
<b>Policy</b>	this whistleblower policy.
<b>Prescribed Body</b>	(a) ASIC (including through its online 'misconduct reporting form' referred to in ASIC Information Sheet 239 <a href="https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports">https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports</a> ); (b) APRA ( <a href="https://www.apra.gov.au/contact-us">https://www.apra.gov.au/contact-us</a> ); (c) ATO (including through its online 'tip-off form' referred to in its tax whistleblower information <a href="https://www.ato.gov.au/general/gen/whistleblowers">https://www.ato.gov.au/general/gen/whistleblowers</a> ); or (d) any prescribed Commonwealth authority.
<b>Whistleblower Laws</b>	the Australian whistleblower laws under the <i>Corporations Act 2001</i> (Cth) (including Part 9.4AAA "Protection for Whistleblowers") and the <i>Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019</i> (Cth), and other associated regulations and/or instruments.
<b>WIO</b>	Whistleblower Investigation Officer (see section 6.1).
<b>WPO</b>	Whistleblower Protection Officer (see section 7.1), being Chair of the SHPA Board sub-committee – Finance and Risk Management (FARM).

## 9 GENERAL

### 9.1 Compliance

It is a condition of any employment or engagement by the Company that all Disclosers must comply at all times with this Policy. Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action.

### 9.2 Contacts

If you have any queries in relation to this Policy, please contact the WPO being the SHPA Treasurer and Chair, Finance and Risk Management Committee (Mr David Brennan – [wpo@shpa.org.au](mailto:wpo@shpa.org.au)).

### 9.3 **Review of the Policy**

This Policy will be reviewed every 2 years and may be amended, withdrawn or replaced from time to time at the Company's sole discretion.

### 9.4 **Details**

<b>Owned By</b>	<b>Authorised By</b>	<b>Last Updated</b>
SHPA Board	SHPA President	15/03/2021