



**Mental Health  
Australia**

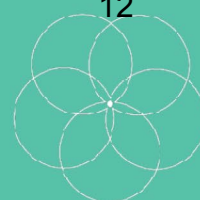
# **Whistleblower Policy and Procedures**

**Mentally healthy people,  
mentally healthy communities**

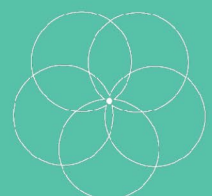
[mhaustralia.org](http://mhaustralia.org)

## Contents

<b>1</b>	<b>Preamble</b>	<b>1</b>
1.1	Introduction	1
1.2	Purpose	1
1.3	Scope	2
1.4	Acknowledgement	2
1.5	Definitions	2
1.6	What is Whistleblowing?	3
1.7	Why Speak Up?	4
1.8	Who can be a Whistle blower?	4
	Table 1 – Corporations Act criteria for protection as a whistleblower	4
1.9	Whistleblower Protections	5
<b>2</b>	<b>Whistleblower Policy</b>	<b>6</b>
2.1	Concerns regarding Illegal Corrupt Behaviour	6
2.2	Concerns regarding Improper or Unethical Behaviour	6
<b>3</b>	<b>Whistleblower Procedures</b>	<b>8</b>
3.1	Responsibilities	8
3.2	External Reporting Entities	8
3.3	Reporting	8
3.4	Anonymity and Confidentiality	9
3.5	Investigation	10
3.6	Findings	11
3.7	Information to Informant	11
3.8	Protection of Informant	11
3.9	Protection of files and records	12



3.10	Assistance for Accused	12
3.11	Training	12
3.12	Breach of Policy	12
4	Supporting documents	13
5	Documentation & Approvals	14
5.1	Document location	14
5.2	Document history	14
5.3	Date for review	<b>Error! Bookmark not defined.</b>



# 1 Preamble

## 1.1 Introduction

The Board of Mental Health Australia is committed to operating legally (in accordance with applicable legislation and regulation), properly (in accordance with organisational policy and procedures), and ethically (in accordance with recognised ethical principles).

Employees are expected to cooperate with the organisation in maintaining legal, proper, and ethical operations, if necessary by reporting non-compliant actions by other people. Correspondingly, employees who do assist in maintaining legal, proper, and ethical operations should not be penalised in any way.

This policy aligns with the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act<sup>1</sup>*, which has applied to protected disclosures made after 1 July 2019. The Act encourages more people to come forward with reports of corporate wrongdoing, more effectively protects people who come forward against reprisal and makes corporations more accountable for business integrity.

This policy is underpinned by Mental Health Australia's guiding set of values:

- Curiosity
- Courage
- Connection

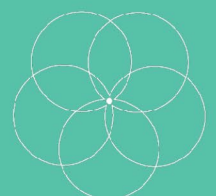
## 1.2 Purpose

The purpose of this policy is to:

- a) Encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to Mental Health Australia or damage to its reputation;
- b) Enable Mental Health Australia to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower as far as possible and provide for the confidentiality and secure storage of the information provided;
- c) Establish policies for protecting whistleblowers against reprisal by any person internal or external to Mental Health Australia;
- d) Provide for the appropriate infrastructure;
- e) Help to ensure Mental Health Australia maintains the highest standards of ethical behaviour and integrity.

---

<sup>1</sup> Federal Register of Legislation, Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019, <https://www.legislation.gov.au/Details/C2019A00010>



### 1.3 Scope

This policy applies to anyone who works for or at Mental Health Australia, including staff, contractors (and their employees), consultants, Board Directors and other officers. The policy does not form part of the terms of employment or engagement of any employee or individual contractor.

Mental Health Australia members and other external parties may report any concerns they have about suspected wrongdoing at Mental Health Australia under the *Feedback and Complaints Guidelines*.

This policy does not replace, but supplements existing processes for dealing with workplace grievances and misconduct, such as suspected breaches of the Mental Health Australia Code of Conduct, and mandatory reporting regime requirements.

This policy is a publicly available document and can be found on the Mental Health Australia website.

### 1.4 Acknowledgement

This policy has been developed using the template whistleblower policy and procedures provided by The Our Community Group and Your Call in the publication: *Whistleblowing at Your Not-for-Profit: A Leader's Guide*.

Mental Health Australia is grateful to The Our Community Group and Your Call for the template.

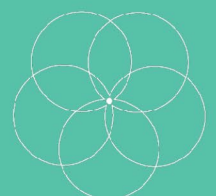
### 1.5 Definitions

A whistleblower is a person—an employee, contractor (and their employees), consultant, Board Director or other officer of Mental Health Australia—who makes, attempts to make, or wishes to make a report in connection with reportable conduct and wishes to avail themselves of protection against reprisal for having made the report.

Breaches of general law, organisational policy, or generally recognised principles of ethics include:

- Corrupt conduct
- Fraud or theft
- Official misconduct
- Maladministration
- Harassment or unlawful discrimination
- Serious and substantial waste of public resources
- Practices endangering the health or safety of staff, volunteers, or the general public
- Practices endangering the environment

Complaints regarding work health and safety should where possible be made through the procedures outlined in Mental Health Australia's Work Health and Safety Policy Statement (May 2021)



**Illegal or Corrupt Behaviour** – a breach of any provision of general law.

**Procedural Fairness** - ‘Procedural fairness’ means acting fairly in administrative decision making. Procedural fairness is concerned with the procedures used by a decision maker, rather than the actual outcome reached. It requires a fair and proper procedure be used when making a decision.<sup>2</sup>

## 1.6 What is Whistleblowing?

Whistleblowing is the act of exposing any illegal, improper or unethical conduct within an organisation so that it can be addressed. It is more commonly known as a “tip-off”.

Whistleblowers can bring to light conduct such as corruption, fraud, theft, harassment, and health and safety violations.

A disclosure of information by an individual qualifies for protection if the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of whistleblowing laws.

Whistleblowing plays a crucial role in managing risk, cultivating an ethical culture in an organisation and ensuring good governance.<sup>3</sup> The need for good governance policy to foster upward reporting in an environment free from recriminations and victimisation is essential if senior management and the Board are to adequately manage risk and cultural issues within Mental Health Australia.<sup>4</sup>

A disclosure of information by an individual concerning a personal work-related grievance does not qualify for protection (except where the grievance is about a breach of the whistleblowing protections).

In particular, a grievance about any matter in relation to the discloser’s employment, or former employment, having (or tending to have) implications for the discloser personally will not qualify where it does not have significant implications for Mental Health Australia.

Examples are:

- An interpersonal conflict between the discloser and another employee;
- A decision relating to the engagement, transfer or promotion of the discloser;
- A decision relating to the terms and conditions of engagement of the discloser; and
- A decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

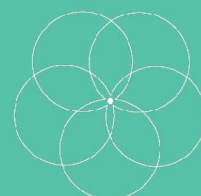
These matters should be reported using Mental Health Australia’s *Employee Dispute Resolution Procedure (July 2021)*.

---

<sup>2</sup> Ombudsman Western Australia, *Procedural Fairness (Natural Justice) Guidelines*, April 2019

<sup>3</sup> Page 6, *Whistleblowing at Your Not-for-Profit: A Leader’s Guide*, The Our Community Group and Your Call, June 2017

<sup>4</sup> Australian Securities and Investments Commission, *Whistleblowers-company officeholder obligations*



## 1.7 Why Speak Up?

Insiders within an organisation who speak up about illegal, improper or unethical conduct within that organisation are often the most effective source of intelligence that leads to the conduct being uncovered.

Reporting such conduct may help to:

- Stop the conduct or bring it to the attention of people who can stop it
- Prevent disadvantage to other people or the organisation from the conduct
- Prevent danger to health and safety or damage to the environment
- Create an opportunity to implement better work procedures to prevent wrongdoing or maladministration in the future
- Bring to account the people responsible for the conduct.<sup>5</sup>

## 1.8 Who can be a Whistle blower?

A whistleblower is a person—an employee, contractor (and their employees), consultant, Board Director or other officer of Mental Health Australia—who makes, attempts to make or wishes to make a report in connection with reportable conduct and wishes to avail themselves of protection against reprisal for having made the report.

Whistleblowers should have legal, ethical, or operational reasons to suspect there may be a breach of law or a risk of danger to the public, and make any disclosures in good faith.

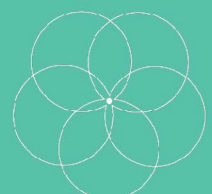
Whistleblowers do not have to disclose their identity in order to be protected under the legislation. Anyone who discloses the identity of a whistleblower who wishes to remain anonymous (or information that could disclose the identity of a whistleblower) faces a civil or criminal penalty.

Under the Corporations Act 2001 (Corporations Act), a person is recognised and protected as a whistleblower if they meet several criteria. The Australian Securities and Investments Commission (ASIC) has summarised these criteria as follows:

**Table 1 – Corporations Act criteria for protection as a whistleblower**

Criteria	Requirement
1. Your role	<p>You <b>must</b> be:</p> <ul style="list-style-type: none"><li>• A current or former officer (usually that means a director or secretary) of the company or organisation your disclosure is about</li></ul>

<sup>5</sup> Page 1, *Speaking Up About Wrongdoing: A guide to making a disclosure under the Public Interest Disclosure Act 2013*, Commonwealth Ombudsman



	<ul style="list-style-type: none"> <li>• A current or former employee of the company or organisation your disclosure is about, or</li> <li>• A current or former contractor, or the employee of a contractor, who has a current contract to supply goods or services (regardless of whether they are paid for doing so) to the company or organisation your disclosure is about</li> <li>• A spouse, relative or dependant of one of the people referred above.</li> </ul>
2. Who the disclosure is made to	<p>You <b>must</b> make your disclosure to:</p> <ul style="list-style-type: none"> <li>• An auditor, or a member of the audit team of the company or organisation</li> <li>• A director, company secretary or senior manager of the company or organisation</li> <li>• A person authorised by the company or organisation to receive whistleblower disclosures, or</li> <li>• ASIC.</li> </ul>
3. Reasonable grounds to suspect breach	<p>You <b>must</b> have reasonable grounds to suspect that the information you are disclosing indicates that the company or organisation, or an officer or employee of the company or organisation, may have breached the Corporations Act or the <i>Australian Securities and Investments Commission Act 2001</i> (ASIC Act) or represents a danger to the public or the financial system.</p>
4. Made in good faith	<p>You <b>must</b> make the disclosure in 'good faith'. That means your disclosure must be honest and genuine, and motivated by wanting to disclose misconduct. Your disclosure will not be 'in good faith' if you have any other secret or unrelated reason for making the disclosure.<sup>6</sup></p>

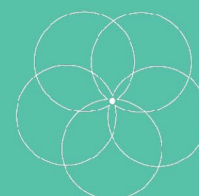
## 1.9 Whistleblower Protections

Research has shown that over 80% of whistleblowers in Australia and New Zealand have faced repercussions for speaking up. This highlights the need for whistleblower protections.

The Corporations Act contains certain protections for whistleblowers who meet the criteria in Table 1 above:

- Protection of information provided by whistleblowers – the 'protected disclosure' and the whistleblower's identity must be kept confidential unless the disclosure is authorised by law.

<sup>6</sup> *Guidance for Whistleblowers* information sheet (INFO 52), Australian Securities and Investments Commission





- Protections for whistleblowers against civil or criminal litigation – this includes protection against breach of contract and allows for reinstatement if the whistleblower’s employment was terminated for making a protected disclosure.
- Protections for whistleblowers from victimisation – a whistleblower can claim compensation for damage suffered from being victimised because they made a protected disclosure.

These protections are designed to encourage people within companies, or with special connections to companies, to alert the company (through its officers), or ASIC, to illegal behaviour.

In addition to the protections provided under the Corporations Act, limited protection is available to Mental Health Australia whistleblowers under the ACT Work Health and Safety Act 2011 (protection from retaliatory action for raising work health and safety issues). (The Fair Work Act 2009 offers protection to employees who exercise a “workplace right” from adverse action by employers, but currently it is unclear if this extends to a whistleblower reporting a wrong suffered by someone else.)

Mental Health Australia is committed to protect whistleblowers from reprisal and encourages people to come forward and alert others to any wrongdoing (see 3.9 Protection of Informant for more information about whistleblower protections).

## 2 Whistleblower Policy

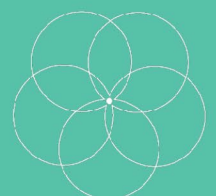
### 2.1 Concerns regarding Illegal Corrupt Behaviour

Where a person believes in good faith on reasonable grounds that any other employee, contractor, consultant, Board Director or other officer of Mental Health Australia has breached any provision of the general law, that person must report their concern to:

- Their manager: or, if they feel that their manager may be complicit in the breach,
- The Chief Executive Officer (CEO): or, if they feel that the CEO may be complicit in the breach,
- Mental Health Australia’s nominated Whistleblower Protection Officer; or, if they feel this to be necessary,
- A person or office independent of Mental Health Australia nominated by Mental Health Australia to receive such information
- The duly constituted authorities responsible for the enforcement of the law in the relevant area.

### 2.2 Concerns regarding Improper or Unethical Behaviour

Where a person believes in good faith on reasonable grounds that any other employee, contractor, consultant, Board Director or other officer of Mental Health Australia has breached any provision of the organisation’s constitution, or its bylaws, or its policies, or its code of conduct, or generally recognised principles of ethics, that employee may report



their concern to:

- Their manager: or, if they feel that their manager may be complicit in the breach,
- The CEO: or, if they feel that the CEO may be complicit in the breach,
- A person or office independent of Mental Health Australia nominated by Mental Health Australia to receive such information
- The duly constituted authorities responsible for the enforcement of the law in the relevant area<sup>7</sup>.

The person making their concern known shall not suffer any sanctions from Mental Health Australia on account of their actions in this regard provided that their actions:

- Are in good faith, and
- Are based on reasonable grounds, and
- Conform to the designated procedures.

Any person within Mental Health Australia to whom such a disclosure is made shall:

- Dismiss the allegation and notify the person making the allegation of their decision if they believe the behaviour complained of to be unquestionably trivial or fanciful;
- Ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding, if they believe the behaviour complained of to be neither trivial nor fanciful.

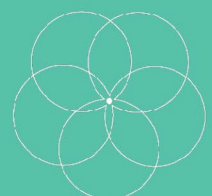
Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Concerns can be reported anonymously and still access the whistleblower protections. When providing a whistleblower report to Mental Health Australia you can request they keep your identity, or information that is likely to lead to your identification, confidential. Generally, companies and organisations that receive your report cannot disclose this information without consent.<sup>8</sup>

---

<sup>7</sup> For example, Australian Charities and Not-for-Profits Commission (ACNC), Australian Securities and Investments Commission (ASIC), Australian Taxation Office (ATO), Australian Federal Police (AFP), and Fair Work Australia.

<sup>8</sup> Australian Securities and Investments Commission, *Whistleblower rights and protections*



## 3 Whistleblower Procedures

### 3.1 Responsibilities

Mental Health Australia's Board is responsible for adopting the *Whistleblower Policy*, and for nominating the organisation's Whistleblower Protection Officer (WPO).

The WPO is responsible for:

- a) Coordinating an investigation into any report received from a whistleblower, and
- b) Documenting and handling all matters in relation to the report and investigation, and
- c) Finalising all investigations.

The CEO is responsible for the implementation of the *Whistleblower Policy*.

All staff, contractors, consultants, Board Directors and other officers are responsible for reporting breaches of general law, organisational policy, or generally recognised principles of ethics to a person authorised to take action on such breaches.

### 3.2 External Reporting Entities

The Board may nominate external persons to whom or agencies to which disclosures may be made under the protections offered under this policy. Where such a nomination is made, employees, contractors, consultants, Board Directors or other officers of Mental Health Australia should be informed by any appropriate method.

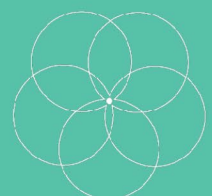
### 3.3 Reporting

The whistleblower policy is repeated here with respect to reporting to outline the whole process.

Where a person believes in good faith on reasonable grounds that any other employee, contractor, consultant, Board Director or other officer of Mental Health Australia has breached general law, organisational policy, or generally recognised principles of ethics, and wishes to report their concern, that person must report their concern to:

- Their manager: or, if they feel that their manager may be complicit in the breach,
- The CEO: or, if they feel that the CEO may be complicit in the breach,
- Mental Health Australia's nominated Whistleblower Protection Officer, or
- A person or office independent of Mental Health Australia nominated by Mental Health Australia to receive such information; or (where a breach of general law is alleged)
- The duly constituted legal authorities responsible for the enforcement of the law in the relevant area.

These procedures do not authorise any person to inform commercial media or social media of their concern, and do not offer protection to any person who does so, unless it is



not feasible for employees, contractors, consultants, Board Directors or other officers of Mental Health Australia to report internally.

Any person reporting such a breach should be informed that:

- As far as lies in Mental Health Australia's power, the person will not be disadvantaged for the act of making such a report; and
- If the discloser wishes to make their complaint anonymously, their wish shall be honoured
- Reporting such a breach does not necessarily absolve the discloser from the consequences of any involvement on their own part in the misconduct complained of.

Any such report should be in writing and should contain, as appropriate, details of:

- The nature of the alleged breach;
- The person or persons responsible for the breach;
- The facts on which the discloser's belief that a breach has occurred, and has been committed by the person named, are founded;
- The nature and whereabouts of any further evidence that would substantiate the discloser's allegations, if known

Evidence to support such concerns should be brought forward at this time if it exists. The absence of such evidence will be taken into account in subsequent consideration of whether to open an investigation into the matter. However, absence of such evidence is not an absolute bar to the activation of Mental Health Australia's investigative procedures. The existence of such a concern is sufficient to trigger reporting responsibilities.

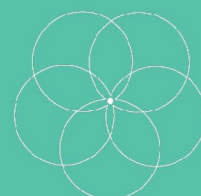
In contemplating the use of this policy a person should consider whether the matter of concern may be more appropriately raised under either Mental Health Australia's *Feedback and Complaints Guidelines* or the *Employee Dispute Resolution Procedure*.

### 3.4 Anonymity and Confidentiality

If the discloser wishes to make their complaint anonymously, their wish shall be honoured.

The discloser should, however, be informed that the maintenance of such anonymity may make it less likely that the alleged breach can be substantiated in any subsequent investigation. Generally companies and organisations that receive a report cannot disclose information without the discloser's consent. However, circumstances in which Mental Health Australia may disclose the information are where disclosure is made:

- To ASIC, *Australian Prudential Regulation Authority*, Australian Federal Police or to a Commonwealth authority, or a state or territory authority, for the purpose of assisting the authority in the performance of its functions or duties.
- To a lawyer to obtain legal advice or legal representation in relation to the operation of the whistleblowing provisions; and/or
- Because it is reasonably necessary to do so for the purposes of Mental Health Australia investigating a matter to which the qualifying disclosure relates (in which case Mental Health Australia will ensure the disclosure does not identify



the whistle-blower and will take all reasonable steps to reduce the risk the discloser will be identified as a result of the disclosure).

Where anonymity has been requested the discloser is required to maintain confidentiality regarding the issue on their own account and to refrain from discussing the matter with any unauthorised persons.

### 3.5 Investigation

#### Review of the Allegations

On receiving a report of a breach, the person to whom the disclosure is made shall:

- If they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision
- If they believe the behaviour complained of to be neither trivial nor fanciful, put in motion the investigation process described below.

The person to whom the disclosure was made shall notify the WPO, who shall be responsible for ensuring that an investigation of the charges is established and adequately resourced and/or will refer the allegations to a nominated person or office external to Mental Health Australia to undertake investigations or provide advice to any internal investigation.

If the issue being alleged relates to the officer holding the position of WPO, the allegations should be directed to a nominated person or office independent of Mental Health Australia, or if there is not one to the CEO.

#### Investigation Process

Terms of reference for the investigation will be drawn up, in consultation with the CEO, to clarify the key issues to be investigated.

An investigation plan will be developed to ensure all relevant questions are addressed, the scale of the investigation is in proportion to the seriousness of the allegation(s) and sufficient resources are allocated.

The investigation will be conducted independently of any person who is the subject of the disclosure.

The investigation will be undertaken in a timely manner.

Strict security will be maintained during the investigative process.

All information obtained will be properly secured to prevent unauthorised access.

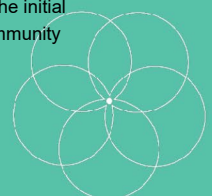
All relevant witnesses will be interviewed and documents examined.

Contemporaneous notes of all discussions, phone calls and interviews will be made.

Where possible, interviews will be taped, with consent.

The principles of procedural fairness (natural justice) will be observed.<sup>9</sup> In particular, where adverse comment about a person is likely to be included in a report, the person

<sup>9</sup> Natural justice and procedural fairness do not require that the person affected be informed of the identity of the person making the initial disclosure, unless that communication constitutes part of the evidence relied upon in making the eventual finding (Institute of Community Directors Australia, Whistleblower Policy Template).



affected will be given an opportunity to comment beforehand and any comments will be considered before the report is finalised.

The person or persons conducting the investigation shall be as far as possible unbiased.

Mental Health Australia may appoint a person or office independent of Mental Health Australia to undertake investigations or provide advice to any internal investigation.

### 3.6 Findings

A report will be prepared when an investigation is complete. This report will include:

- The allegations
- A statement of all relevant findings of fact and the evidence relied upon in reaching any conclusions
- The conclusions reached (including the damage caused, if any, and the impact on the organisation and other affected parties) and their basis
- Recommendations based on those conclusions to address any wrongdoing identified and any other matters arising during the investigation.

A report will be provided to the Mental Health Australia Board or its delegate.

Any findings of the investigation related to criminal activity will be reported to the police and/or regulators.

### 3.7 Information to Informant

Subject to considerations of the privacy of those against whom the allegations are made, the whistleblower will be kept informed of:

- Relevant progress of an investigation
- Relevant outcomes of an investigation.

The complainant will not receive a copy of the formal report.

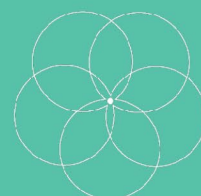
### 3.8 Protection of Informant

#### Retaliation Prohibited

The WPO shall designate an officer to be responsible for ensuring that the person who has made the allegation in good faith on reasonable grounds suffers no employment-related disadvantage on account of their actions in this matter.

This includes (but is not limited to) protection from:

- Termination of employment;
- Disciplinary action;
- Performance management;
- Bullying or harassment; or



- Unlawful discrimination

The WPO will liaise with Mental Health Australia's Human Resources Officer.

Mental Health Australia recognises that making a disclosure as a whistleblower can be stressful. If a person who makes a disclosure is an employee of the organisation, they may access Mental Health Australia's Employee Assistance Program (EAP) and may also request additional support.

While Mental Health Australia may not be able to provide the same level of counselling support to other whistleblowers, the organisation will look at ways to provide support to the extent reasonably possible.

### 3.9 Protection of files and records

All files and records created from an investigation will be securely retained.

### 3.10 Assistance for Accused

Mental Health Australia has an obligation to all parties including the person accused of wrongdoing. The WPO shall designate an officer to be responsible for ensuring that the person accused is advised where they can access Mental Health Australia's EAP.

### 3.11 Training

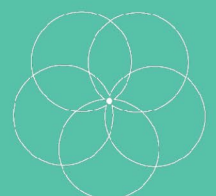
The Whistleblower Protection Officer will ensure staff are familiar with this policy and procedures and complete whistleblowing awareness training.

Training must cover three key areas: how to raise a concern, how staff will be protected and how the concern will be dealt with. An online training module has been developed to cover these areas.

### 3.12 Breach of Policy

Breach of the policy may be regarded as misconduct, which may lead to disciplinary action. In particular, any breach of confidentiality of the information provided by a whistleblower, or a whistleblower's identity, and any retaliation against a whistleblower, will be taken seriously and if appropriate will be separately investigated by Mental Health Australia.

An individual who is found to have disclosed the information or to have retaliated (or threatened to retaliate) against a whistleblower may be subject to further action, including disciplinary action in the case of employees (also refer to 1.9 Whistleblower Protections).





## 4 Supporting documents

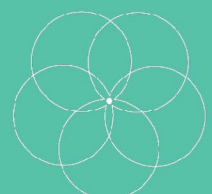
The Australian Standard AS 8004-2003, *Whistleblower Protection Programs for Entities* provides guidance for organisations developing a whistleblower protection program.

The Australian Stock Exchange Corporate Governance Council's *Principles of Good Corporate Governance and Best Practice Recommendations* include a recommendation for companies to establish a code of conduct that encourages the reporting of unlawful or unethical behaviour and protects whistleblowers who report violations in good faith.<sup>10</sup>

- *Corporations Act 2001* (Part 9.4AAA)
- Standards Australia, AS 8004-2003 (Incorporating Amendment No. 1), Australian Standard, *Whistleblower Protection Programs for Entities*, November 2004
- Our Community and Your Call, *Whistleblowing at Your Not-for Profit: A leader's guide*, June 2017
- Fair Work Act 2009

---

<sup>10</sup> Principle 3: Act ethically and responsibly, Recommendation 3.1, *Corporate Governance Principles and Recommendations (3<sup>rd</sup> Ed)*, Australian Stock Exchange Corporate Governance Council





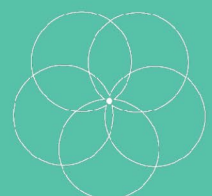
## 5 Documentation & Approvals

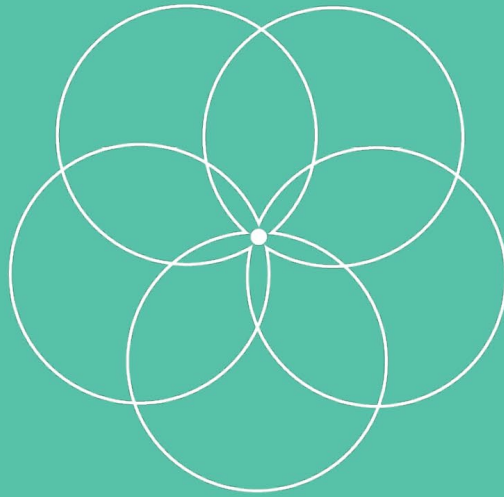
### 5.1 Document location

Document Title	ECM Location
Whistleblower Policy and Procedures – March 2022	19/4479 (Word), 19/4480 (PDF)

### 5.2 Document history

Version	Date	Description	Author
1	28/8/2019	Whistleblower Policy and Procedures reviewed and approved by FARM Committee	Deputy CEO/ Company Secretary
1.1	22/10/2019	Whistleblower Policy and Procedures reviewed and approved by Governance Committee	Deputy CEO/ Company Secretary
1.2	25/11/2019	Whistleblower Policy and Procedures endorsed by the Board	Deputy CEO/ Company Secretary
2	13/1/2020	Added 4.0 – External Reporting Process from Your Call	Corporate Governance Advisor
3	3/3/2022	Revised Whistleblower Policy and Procedures reviewed by Executive and on agenda for March Governance Committee meeting.	Corporate Governance Advisor
3.1	30/3/2022	Updated Whistleblower Policy and Procedures endorsed by the Board	Corporate Governance Advisor
3.1.1	28/2/25	Removed reference to YourCall as provider no longer used	Company Secretary





# Mental Health Australia

Mentally healthy people,  
mentally healthy communities

[mhaustralia.org](http://mhaustralia.org)

Mental Health Australia is the peak independent national representative body of the mental health sector in Australia.

**Mental Health Australia Ltd**

9-11 Napier Close  
Deakin ACT 2600  
ABN 57 600 066 635

**P** 02 6285 3100  
**F** 02 6285 2166  
**E** [info@mhaustralia.org](mailto:info@mhaustralia.org)