



Whistleblower Protections Policy

Contents

Overview	1
Policy Statement	2
Whistleblowing.....	2
How to Make a Whistleblowing Report	3
Protection for Whistleblowers	4
Protection from Reprisals.....	5
Roles and Responsibilities	7
Related Documents and References	8
Definitions	8
Document Control Information.....	11

Overview

TSA encourages people to speak up	<p>The Salvation Army (TSA) Australia Territory recognises that the act of choosing to report wrongdoing may require strong individual courage and commitment to doing the right thing in a difficult situation.</p> <p>Doing the right thing is central to TSA's values and is essential for us to continue to carry out our mission and have the trust of the broader community we serve.</p> <p>TSA wants a culture where every single person connected to the movement or its work knows that if they have reasonable grounds for a concern about wrongdoing, by even the most senior personnel of the movement, they are encouraged to report their concerns to any approved Report Recipient and that TSA will make every possible effort to protect and support Whistleblowers who raise these concerns.</p>
Purpose	<p>To encourage and facilitate the reporting of information regarding improper illegal, corrupt and/ or unethical conduct by TSA or its personnel. This policy aims to provide a safe and confidential structure where Whistleblowers can raise these concerns without fear of detrimental treatment.</p>
Who does this apply to?	<p>This policy applies to all current and former personnel of TSA, including members of the board of TSA (Board), suppliers of goods or services to TSA, associates of TSA and includes their spouse, relative or dependents.</p> <p>This policy may apply to individuals located outside of Australia.</p>
Effective date	<p>16/10/2025"<To be completed by the Territorial Policy Team when the policy is published>"</p>

Policy Statement

Valuing transparency and accountability

TSA:

- Recognises the value of transparency and accountability
- Supports the making of disclosures that reveal systemic faults
- Takes steps to avoid mistreatment of Whistleblowers
- Provides appropriate protections for Whistleblowers
- Is committed to addressing Whistleblower concerns

TSA's Reporting requirements

This policy provides reporting requirements that:

- Allow TSA to deal effectively and appropriately with reports in a way that will protect, as far as is reasonably practicable, the identity of the Whistleblower
- Facilitate protection, as far as is reasonably practicable, from any negative actions that may arise from submitting a report
- Ensure principles of procedural fairness are applied to investigations in response to reports
- Support the appropriate infrastructure including:
 - Systems, processes and mechanisms for reporting and investigation
 - Protection and support of Whistleblowers
 - Secure storage of information that is provided by Whistleblower

Whistleblowing

Benefits

The benefits of the effective application of this policy include:

- An improved culture in which personnel are safe and confident they can raise concerns
- Improved quality and safety of service delivery
- Improved compliance
- Improved work health and safety
- Improved personnel confidence in the culture of TSA to address inappropriate conduct

Types of reports

Reports may be made about TSA as a movement, or its personnel.

Reports may also be made about action taken, suspected to be taken, or failed to be taken in relation to whistleblowing.

Timeframe

The conduct or action being reported may have taken place in the past, may still be occurring, or may be suspected to occur or be engaged in, in the future.

Incident, feedback and complaints process

This policy exists alongside the:

- Feedback and Complaints Policy
- Client Incident Management Policy
- Person of Interest (Safeguarding) Policy
- Responding to Safeguarding Concerns Procedure
- Workplace Relations Policy and associated Procedures
- Whistleblower Obligations Framework

The Feedback and Complaints Policy provides the incident, complaints, compliments and suggestions mechanism for anyone who engages with TSA including clients, participants and members of the community.

How to Make a Whistleblowing Report

Protected Reports

Under Australian law, legislative protections are available to Whistleblowers who make a report, based on reasonable grounds, of Potential Wrongdoing to a Report Recipient. The reporting requirements vary between the various Whistleblower Regimes for which TSA is subject to. These requirements are set out, for each Whistleblower Regime, in the Whistleblower Obligations Framework. In certain circumstances a report can be made to a lawyer for the purpose of obtaining legal advice or emergency disclosures and public interest disclosures can be made to a member of parliament or to a journalist. Whistleblowers are encouraged to seek independent legal advice before making a public interest disclosure or emergency disclosure to a member of parliament or a journalist to ensure that the criterion for protection is satisfied before making the disclosure.

In most circumstances a Whistleblower does not need to prove the allegations, but they are encouraged to provide evidence in support of the disclosure if it is safely available. A Whistleblower may still qualify for protection even if their report turns out to be incorrect or unsubstantiated, provided they have a reasonable basis for making the report.

A Whistleblower can, in most circumstances, remain anonymous when making a report of Potential Wrongdoing, depending on the Whistleblower Regime under which they are making a report. However, if a Whistleblower chooses to remain anonymous, this may affect the ability of TSA or the person or body to which the report has been made to investigate and properly communicate with the Whistleblower about the report.

TSA encourages disclosers who would prefer to remain anonymous, who make a report to TSA, to maintain ongoing two-way communication with TSA, where appropriate, so that TSA can ask follow-up questions and provide feedback. This can also be done using the Your Call service (see below).

Reporting to a Report Recipient

TSA encourages everyone to report actual or suspected Potential Wrongdoing as soon as a person becomes aware of it. The preferred first point of contact is to the Whistleblower's applicable Divisional Commander or Head of Department, depending on the requirements in the Whistleblower Obligations Framework for the Whistleblower Regime the Potential Wrongdoing relates to. However, if the Whistleblower is concerned this person would have a conflict of interest in knowing the information and/or may not act appropriately on being told, they may choose to report to a different Report Recipient or to Your Call. A Whistleblower may be required to report to specific persons or

bodies in order to receive Whistleblower protections. Specific reporting requirements for each Whistleblower Regime are provided in the Whistleblower Obligations Framework.

Reporting to Your Call

If a person is not comfortable raising their concerns internally, TSA has engaged Your Call to provide external, third-party whistleblower services.

Your Call provides a call centre for making whistleblowing reports, which enables a person to make an anonymous report. They also provide the ability for a person to make an anonymous report through their website. Your Call can be contacted at the following:

Phone: 1300 790 228 (9am – midnight AEST on business days)

Web: www.yourcall.com.au/report. Please refer to “TSA” as the organisation ID. When making a report, a person should provide as much information as possible, including details of the potential wrongdoing, people involved, dates, locations and any more evidence that may exist.

Once again, a Whistleblower should check if there are specific reporting requirements under the relevant Whistleblower Regime, as provided in the Whistleblower Obligations Framework.

Additional information

If a person requires additional information about making a whistleblower report or the operation of this policy, they can contact the Secretariat Lead.

Protection for Whistleblowers

Confidentiality of identity

TSA offers protection and support to Whistleblowers who make a report of Potential Wrongdoing that appears to have reasonable grounds in accordance with this policy.

Subject to the below exceptions, Whistleblower identity will be kept confidential and, to the extent required under any regime, TSA (including TSA’s aged care workers, responsible persons and any associated entities of TSA), as far as reasonably practicable, will ensure the protection of the identity of such Whistleblower (and any other persons to whom a regime also requires protection of their identity). Whistleblower reports may be made anonymously, to the extent possible under the requirements for each Whistleblower Regime.

In most instances it is illegal for a person to identify a Whistleblower, or disclose information likely to lead to their identification, subject to some exceptions including those listed below. Maintaining confidentiality of identity of a Whistleblower who has made a report of Potential Wrongdoing with reasonable grounds is crucial, particularly in ensuring reprisals are not made against a Whistleblower.

Exceptions to keeping the identity of a Whistleblower confidential

TSA takes all reports seriously and will protect the identity of the Whistleblower, information that may lead to Whistleblower identification and the contents of the report, except if (to the extent permitted under each Whistleblower Regime):

- The Whistleblower consents in writing to the disclosure of their identity
- The Whistleblower self-discloses their identity
- The identity of the Whistleblower becomes known, other than by an action of TSA and all reasonable steps to reduce the risk that the Whistleblower will be identified, have been exercised

- Disclosure of the identity of the Whistleblower is compelled by law
- An authorised disclosure of the Whistleblower's identity, or information likely to lead to their identification, is made to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority or the Australian Federal Police
- It is reasonably necessary to disclose information likely to lead to a Whistleblower's identification for the purposes of investigating a matter. All reasonable steps will be taken to reduce the risk that the Whistleblower is identified

How TSA protects confidentiality of identity

Ways that TSA will protect a Whistleblower's identity include:

- Removing personal information or other details that may identify a Whistleblower
- Referring to the Whistleblower in gender-neutral terms or via a pseudonym
- Where possible, the Whistleblower will be contacted to help identify whether certain aspects of their report could inadvertently identify them
- Storing whistleblower reports securely

Limitations on public comment

Public comments by TSA Personnel, including interactions with commercial and social media, must be in accordance with TSA's Media Relations Policy.

TSA does not authorise any personnel to inform commercial or social media of their report and will not offer protection to any personnel who do so.

Legal protections for TSA Personnel making reports to journalists or parliamentarians will apply only in circumstances where the disclosure is of public interest or emergency and is permitted under the relevant Whistleblower Regime and the process set out in this policy for making such disclosures is followed. Where such reports are not warranted, not properly made, or do not have reasonable grounds, the legal protections will not apply. For this reason, any person intending to make a public interest disclosure or an emergency disclosure to a journalist or member of parliament is encouraged to get independent legal advice before doing so.

Protection from Reprisals

Potential retaliation

A Whistleblower may be concerned that they may experience retaliation from other personnel or TSA as a movement.

In relation to a Whistleblower report, TSA will protect the Whistleblower from:

- Being terminated or having their engagement ceased
- Performance management
- Harassment or on the job workplace bullying
- Harm or injury, including psychological harm
- Damage to property, reputation or financial position
- Warnings or disciplinary actions
- Discrimination
- Any other action that can be perceived as retaliation for making a report
- Threats of retaliation action

To the extent required under any regime, TSA (including TSA's aged care workers, responsible persons and any associated entities of TSA), as far as reasonably practicable, will ensure it does not cause detriment to a Whistleblower or threaten to cause detriment to a Whistleblower in the manner outlined above.

Where the disclosure itself identifies criminal activity or breaches of TSA policy of the Whistleblower themselves, then performance management may still occur if Whistleblower protections are not in place.

Addressing retaliation

The Whistleblower must contact the Whistleblower Protections Officer (WPO) if they:

- Believe that retaliation is imminent
- Are targeted for retaliation
- Have already been retaliated against

The WPO must take the appropriate protective action and make recommendations for resolution of any retaliatory behaviour.

TSA is committed to selecting the best possible option to protect the Whistleblower.

Compensation and other remedies Whistleblowers are protected from some civil, criminal or administrative action being taken against them because they have made a report of Potential Wrongdoing under this policy. This includes civil action being taken against them for breaching the terms of their engagement, criminal action being taken against them (except because they have made a false report) or administrative action (e.g. disciplinary action) being taken against them.

However, these protections do not apply to action being taken against a Whistleblower for misconduct that the Whistleblower has engaged in, that is revealed in the report or subsequent investigation.

It is an offence under most of the Whistleblower Regimes to cause or threaten to cause detriment to a Whistleblower because they have made, propose to make, or could make a report of Potential Wrongdoing in accordance with this policy and serious penalties apply. In most instances, a Whistleblower who is subject to such detriment may seek compensation or other remedies from a Court if they have suffered loss, damage or injury because TSA failed to take reasonable precautions and exercise due diligence to prevent the detriment.

Protection for others

The WPO will take into account any protection that may be appropriate for other parties involved in a whistleblowing matter, e.g. witnesses and alleged victims/survivors of Wrongdoing.

Separation of issues

While TSA is committed to protecting Whistleblowers from retaliation, it is also important that Whistleblowers remain effective in their position and continue to fulfil the requirements of their role as long as that remains reasonably practicable and safe for them to do so.

TSA will retain the right to address any performance or contractual issues with Whistleblowers provided they are kept separate from and not influenced by the whistleblowing.

Reporting to the Board, Access and Training in relation to this policy

Board oversight

The Board (either directly or through its Audit and Risk Committee) will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under its policy are addressed and mitigated as part of its risk management and corporate governance.

Training

The Secretary to the Property Trusts will be responsible for ensuring the ongoing education and training on the Whistleblower Policy, processes and procedures to all personnel.

Policy availability

This policy will be available to TSA personnel on the intranet [Policy Hub - Home \(sharepoint.com\)](#). A copy will also be available on TSA's website to ensure it is accessible for all eligible Whistleblowers.

Roles and Responsibilities

The roles associated with execution of this policy are indicated in the table below.

Roles	Responsibilities
Whistleblower	<ul style="list-style-type: none">▪ Provides a Report Recipient verifiable information of improper, illegal or corrupt conduct within TSA or, in certain circumstances under various Whistleblower Regimes, in other public settings the Whistleblower observes.
Report Recipient	<ul style="list-style-type: none">▪ Receives a report from the Whistleblower▪ Protects the confidentiality of the Whistleblower's identity▪ Liaises with TSA's WPO to manage TSA's response to whistleblowing reports
Whistleblower Protections Officer (WPO)	<ul style="list-style-type: none">▪ May receive whistleblowing reports▪ Protects the confidentiality of the Whistleblower's identity▪ Works with Whistleblowers and report recipients to manage TSA's response to whistleblowing reports▪ Reports directly to the Board on whistleblower reports (while keeping the Whistleblower's identity confidential)▪ Facilitates communication and awareness of this policy and related processes to all personnel▪ Ensures protection is afforded to the Whistleblower

Related Documents and References

Related Policy Documents

Whistleblower Protections Policy
Whistleblower Protections Procedure
Feedback and Complaints Policy
Client Incident Management Policy
Media Relations Policy
Workplace Relations Policy
Whistleblowers Obligations Framework

Related Legislation

Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)
Privacy Act 1988 (Cth) *Corporations Act 2001 (Cth)* *Crimes Act 1988 (Cth)*
Fair Work (Registered Organisations) Act 2009 (Cth)
Public Interest Disclosure Act 2013 (Cth)
National Disability Insurance Scheme Act 2013 (Cth)
Aged Care Act 2024 (Cth)
Taxation Administration Act 1953 (Cth)
Public Interest Disclosure Act 2010 (Qld)
Public Interest Disclosures Act 2018 (SA)
Public Interests Disclosures Act 2012 (Vic)
Public Interest Disclosures Act 2003 (WA)

Other Relevant Documents /Resources

N/A

Definitions

Definitions are located in the [Glossary of Terms and Definitions](#).

Term	Definition
Conflict of Interest	<p>Actual conflict of interest A conflict between the duties and personal interests of an individual that improperly influences the performance of their duties.</p> <p>Apparent or perceived conflict of interest A situation where it appears that an individual's personal interests could improperly influence the performance of their duties but this is not in fact the case.</p> <p>Potential conflict of interest Where a process has been set in motion that in the future, may create a conflict of interest.</p>
Reasonable Grounds	A Whistleblower is not required to prove their concerns but must have 'reasonable grounds' to suspect Potential Wrongdoing. In practice, this means that there is more than just a suspicion of Potential Wrongdoing and there is some information that supports the allegation. However, a Whistleblower does not need to prove their allegations.
Report	The written report which a Whistleblower provides to a Report Recipient.

Term	Definition
Report Recipient	<p>A person who receives a Report from a Whistleblower and is required to respond to the report in line with the Whistleblower Protections Policy, Whistleblower Protections Procedure and Whistleblowers Obligations Framework.</p> <p>Personnel may make Reports to (depending on the specific requirements under each of the relevant Whistleblower Regimes – those requirements are contained in the Whistleblowers Obligations Framework):</p> <ul style="list-style-type: none"> ▪ Divisional Commanders ▪ Heads of Department ▪ Whistleblower Protections Officer (WPO) ▪ Members of the Operations Council (OC) including the OC Secretariat ▪ Board Members, including the Board Secretariat ▪ The auditor or member of an audit team conducting an audit on TSA ▪ ‘Your Call’ Whistleblower service ▪ The lawyers of TSA ▪ Various regulatory and statutory bodies and representatives
TSA Personnel	<p>A person who may be an officer, territorial envoy, aux-lieutenant, cadet, candidate, person serving under officer conditions, employee, volunteer, a contractor or subcontractor, employee of a contractor or subcontractor, employee of a labour hire company, trainee or student on placement that is engaged in any TSA mission delivery or mission expression or is a Board or Board Committee member.</p>
Whistleblower	<p>Any current or former:</p> <ul style="list-style-type: none"> ▪ Member of personnel ▪ Suppliers of goods and services to TSA ▪ An associate of TSA ▪ Spouse, relative or dependent of one of the individuals referred to above <p>who provides a Report within the context of whistleblowing, acting on objective reasonable grounds. A Whistleblower may be located outside of Australia.</p> <p>A Whistleblower can still qualify for protection even if their disclosure turns out to be incorrect, if they had reasonable grounds for reporting Potential Wrongdoing.</p>
Whistleblower Obligations Framework	<p>The Whistleblower Obligations Framework of TSA, current as at 6 February 2025.</p>
Whistleblower Regimes	<p>Any legislative regime contained in the Whistleblower Obligations Framework, including:</p> <ul style="list-style-type: none"> ▪ <i>Fair Work (Registered Organisations) Act 2009 (Cth)</i> ▪ <i>Corporations Act 2001 (Cth)</i> ▪ <i>Public Interest Disclosure Act 2013 (Cth)</i> ▪ <i>National Disability Insurance Scheme Act 2013 (Cth)</i> ▪ <i>Aged Care Act 2024 (Cth)</i> ▪ <i>Taxation Administration Act 1953 (Cth)</i> ▪ <i>Public Interest Disclosure Act 2010 (Qld)</i> ▪ <i>Public Interest Disclosures Act 2018 (SA)</i> ▪ <i>Public Interests Disclosures Act 2012 (Vic)</i> ▪ <i>Public Interest Disclosures Act 2003 (WA)</i>

Term	Definition
Potential Wrongdoing	<p>Potential Wrongdoing is any:</p> <ul style="list-style-type: none"> ▪ Suspected or actual misconduct or improper state of affairs or circumstances in relation to TSA. This includes any conduct in relation to TSA personnel. ▪ Conduct at TSA that represents a danger to the public or the financial system, even if this does not breach any law. ▪ Conduct that the disclosure of, under any of the Whistleblower Regimes, qualifies for protection under such Whistleblower Regime. <p>Examples of Potential Wrongdoing include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ TSA has failed to act legally or ethically in accordance with TSA's values ▪ Conduct endangering health or safety or causing damage to the environment ▪ Dishonest or unethical behaviour ▪ Conflicts of interest ▪ Conduct likely to damage TSA's reputation ▪ Accounting, tax, audit or resource mismanagement concerns that may lead to financial loss for TSA ▪ An improper state of affairs or circumstances, in relation to the tax affairs of TSA ▪ Misconduct ▪ Breaches of the Corporations Act 2001 (Cth), financial sector laws enforced by ASIC or APRA ▪ Conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment of a period of 12 months or more ▪ A substantial and specific danger to the health or safety of a person with a disability ▪ The conduct of another purpose that could be considered a reprisal against a Whistleblower ▪ Deliberate concealment of the above <p>In most cases, Reports relating solely to personal work-related grievances are not considered to be Potential Wrongdoing and whistleblower protections do not apply. Reports relating solely to personal work-related grievances should be raised under the Grievance Resolution Procedure.</p> <p>However, sometimes, there are personal work-related grievances which do qualify as protected disclosures, for example, if they are part of a problematic pattern or systemic issue within TSA, will have a significant implication for TSA, or if the grievance is bundled with illegal activity or another protected disclosure or if the grievance concerns detriment to a Whistleblower in relation to making a report of Potential Wrongdoing.</p> <p>Reports relating to TSA personnel misconduct towards clients and community members may also be raised under the Incident Management Procedure and Responding to Safeguarding Concerns Procedure.</p>

Document Control Information

Theme	Governance	
Category	Legal, Risk and Compliance	
Policy Owner	Territorial Commander, Chair of the Board	
Policy Implementer	Secretary to the Property Trusts	
Approval Authority	Australia Territory Board	
Review Date	October 2025	
Next Review Date	October 2028	
Document History	Date approved	Summary of Changes
	08/08/2019	Inaugural version
	05/02/2021	12 month review
	14/04/2022	Content update and external review by Your Call
	16/10/2025	Content updated and external review by Mills Oakley