



**DOOR OF HOPE AUSTRALIA INC**

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**ABN: 44 901 023 508**

## DOHA WHISTLEBLOWER POLICY

### 1. Purpose

Door of Hope Australia Inc. (DOHA) is committed to the highest standards of legal, ethical, and moral behaviour.

This policy provides a supportive environment where "eligible whistleblowers" can raise concerns about misconduct without fear of retribution, victimisation, or detriment.

### 2. Scope and Application

This policy applies to all DOHA:

- Directors and Officers.
- Employees and Volunteers.
- Contractors, Consultants, and Suppliers.
- Partners and associated implementing organisations.
- Former employees or relatives of any of the above.

### 3. What is Reportable Misconduct?

Whistleblowing is the disclosure of actual or suspected misconduct, including:

- **Illegal Activity:** Theft, fraud, corruption, or bribery.
- **Unethical Behaviour:** Dishonesty, altering records, or breaching the DOHA Code of Conduct.
- **Harm:** Deliberate unsafe work practices or risks to the safety of others.
- **Mismanagement:** Gross maladministration or waste of donor funds.
- **Retaliation:** Any action taken against someone for making a report under this policy.

## 4. Protections for Whistleblowers

DOHA provides the following protections to any person making a report in good faith:

- **Confidentiality:** Your identity will be kept secret to the extent permitted by law. It is illegal for DOHA to disclose your identity without your consent, except to a regulator (like ASIC or the ACNC) or the police.
- **Protection from Detriment:** DOHA will not tolerate any dismissal, demotion, harassment, or damage to the reputation of a whistleblower.
- **Immunity:** While reporting does not grant total immunity for one's own misconduct, active cooperation may be considered a mitigating factor in disciplinary proceedings.

## 5. Reporting Procedures

We encourage reports to be made as soon as a suspicion arises.

### *Internal Reporting*

- **Primary Contact:** Chairman of the Board (CB), Bryan Grasby (bgrasby@doorofhope.com.au).
- **Secondary Contact:** If the report involves the CB, contact the Project Manager, Michelle Harry (mharry@doorofhope.com.au).

### *External Reporting*

Whistleblowers may also report concerns directly to:

- **The Australian Charities and Not-for-profits Commission (ACNC).**
- **ACFID** (if the report relates to a breach of the Code of Conduct).
- **ASIC** (for serious corporate legal breaches).

## 6. The Investigation Process

1. **Appointment:** Upon receiving a report, the Contact Point will appoint a **Whistleblower Protection Officer (WPO)**. This must be a person not implicated in the report.
2. **Independence:** The WPO may be an internal staff member or an external investigator if the matter is high-risk or involves senior leadership.
3. **Conduct:** The investigation will be objective, fair, and independent of the area where the wrongdoing is alleged to have occurred.
4. **Feedback:** The WPO will keep the whistleblower informed of the progress and outcomes, subject to privacy considerations of the accused.

## 7. Responsibilities of Leadership

The Board of Directors is responsible for maintaining the integrity of this policy. The CB must ensure that all staff and volunteers are trained in identifying misconduct and understand how to use the "protected" reporting channels.

## 8. Policy Review

The DOHA Whistleblower Policy will be reviewed every two years to ensure it remains compliant with the Corporations Act and ACFID standards.

Last Reviewed: 13<sup>th</sup> March 2026

Next Review: [Date + 2 Years]