**ROTARY INTERNATIONAL DISTRICT 9810**

**WHISTLEBLOWER POLICY**

**adopted by District Board 11th November 2019**

This policy will apply to all Rotary and Rotaract Clubs within District 9810 and include all Committees and associated Groups covering all members of such clubs.

**purpose**

Rotary District 9810 is committed to the highest standards of conduct and ethical behaviour in all of our activities and to promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.

Rotary District 9810 encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving all Rotary activities and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

This policy will be made available to all Rotarians and Rotaractors via the District 9810 website.

**REPORTABLE CONDUCT**

You may make a report under this policy if you have reasonable grounds to suspect that a Rotarian of this District or any other District, or other person who has dealings with any Rotary or Rotaract Club within District 9810 has engaged in conduct ("Reportable Conduct") which:

* Is dishonest, fraudulent or corrupt, including bribery
* Is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
* Is unethical or in breach of Rotary policies;
* Is potentially damaging to the reputation of Rotary;
* Amounts to an abuse of authority;
* May cause financial loss to Rotary or be otherwise detrimental to Rotary’s interests;
* Involves harassment, discrimination, victimisation or bullying,
* Involves any other kind of misconduct or an improper state of affairs or circumstances.

**Where to make the report**

Rotary District 9810 has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

For the purposes of this policy to ensure appropriate escalation and timely investigation, we request that reports are made to a Disclosure Officer, who will be any one of:

* For Club matters to The President or Secretary of that Club;
* The District Governor ;
* The District Governance Director

**Protection for whistleblowers**

Rotary District 9810 is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report are treated fairly and do not suffer detriment.

*Protection against detrimental conduct*

Detrimental treatment includes harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report. If you are subjected to detrimental treatment as a result of making a report under this policy you should:

Inform a disclosure officer [as defined above]

*Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this policy, Rotary District 9810 will only share your identity as a whistleblower or information likely to reveal your identity if:

You consent;

The concern is reported to a Government Authority or Police;

The concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Rotary D9810 needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk.

Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

*Protection of files and records*

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

Unauthorised release of information to someone not involved in the investigation (other than Executive or Board Members who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter.

**Duties of MEMBERS**

It is expected that Members who become aware of actual or suspect on reasonable grounds, potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.

**Adopted 11-11-2019**