**WHISTLEBLOWER POLICY**

**Definition of Whistleblowing**   
“The disclosure by or for a witness, of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing”.

**Purpose**   
(insert)…….Golf Club’s Whistleblower Policy has been created to is aligned to both the Club’s values and Code of Conduct and with the objective of providing a safe and confidential environment for protecting employees who raise issues of ‘reportable conduct’, without fear of reprisal, dismissal or discriminatory treatment. In short, employees will be protected from feeling threatened as a result of making a complaint.  
  
**Scope**   
All Club Employees (including contractors, consultants and former employees) are covered by this Policy.   
 **Reporting channels**   
Reporting may be made to the Club’s GM, Board or member of the Board, Executive, Auditor, he company’s auditor, or a member of the company’s audit team or a person authorised by the club to receive whistleblower disclosures.  
  
The Club will put in place a Whistleblower Protection Officer who will assess the complaint and recommend a course of action. All matters raised will be treated in a confidential, secure and sensitive manner.

**Policy Explained in Context**  
In normal circumstances employees that have a concern will first discuss such matters with their supervisors, managers or other appropriate personnel such as a mentor. These may be concerns such as employment terms or matters such as conflicts with colleagues and managers, disciplinary sanctions, correct and timely payment of wages and benefits.

When a matter of a serious and sensitive nature thatcould have an adverse impact on the operations and performance of the Club, reporting under the Whistleblower Policy may be more pertinent.

This may include conduct or wrongdoing that is:

* fraudulent or corrupt,
* illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of State, Federal or Territory legislation
* unethical, such as acting dishonestly; altering club records; wilfully making false entries in the books and records; engaging in questionable accounting practices; or wilfully breaching the Club’s code of conduct or policies
* is potentially damaging to the Club such as maladministration or substantial waste of resources
* is seriously harmful or potentially seriously harmful to a club person such as deliberate unsafe work practices or wilful disregard to the safety of others in the workplace
* may cause serious financial or non-financial loss to the club;
* or damage its reputation; or be otherwise seriously contrary to the Club’s interests   
  involves any other kind of serious impropriety including retaliatory action against a Whistleblower for having made a wrongdoing disclosure.

**Note: Disclosure to be made in good faith**

Disclosure must be made in ‘good faith’. It must be honest and genuine, and motivated by wanting to disclose misconduct. Your disclosure may not be considered ‘in good faith’ if you have any other secret or unrelated reason for making the disclosure.

XX………….Golf Club’s Whistleblowing Policy

Approved by: The Board  
Date:

Related reading:<https://theconversation.com/whistleblower-law-needs-more-bite-to-fight-greyhound-cruelty-and-corporate-fraud-52542>