



Purpose

Cancer Council Queensland (**CCQ**) is committed to integrity, accountability and transparency in all its activities.

This Whistleblower Policy aims to:

- Encourage the reporting of actual or suspected instances of misconduct, or any other behaviour which is dishonest, corrupt or illegal;
- Ensure that people who make a report under this Policy can do so safely, without fear of victimisation, retaliation, harassment, or discrimination;
- Provide guidance on who can make a report under this Policy and how these reports will be investigated; and
- Comply with CCQ's legal and regulatory obligations (such as under the Corporations Act).

Our Commitment

CCQ is committed to honesty, integrity and accountability in everything that it does. CCQ wants everyone to feel safe to speak up about their concerns of wrongdoing without fear of retaliation.

Who Can Make a Report

Individuals can make a report under this Policy if they are (or have been):

- a. employees or officers of CCQ;
- b. volunteers;
- c. suppliers of goods or services (whether paid or unpaid) to CCQ, including current or former employees of suppliers;
- d. associates of CCQ (for example, a director);
- e. relatives, spouses, or dependants of the individuals referred to above; or
- f. prescribed by the regulations,

(each an **Eligible Person**).

What to Report and When

CCQ encourages Eligible Persons to report any potential wrongdoing as soon as possible. Generally, potential wrongdoing includes any conduct where the Eligible Person reasonably suspects that:

- there is misconduct or an improper state of affairs or circumstances in relation to CCQ (for example, fraud or dishonesty); or
- CCQ, or an officer or employee of CCQ, has engaged, or is engaging, in conduct that:
 - is an offence under, or breaches, a law in any of the following Acts (including the instruments made under these Acts):
 - *Corporations Act 2001 (Cth)* (**Corporations Act**);
 - *Australian Securities and Investments Commission Act 2001 (Cth)*; or
 - *Insurance Act 1973 (Cth)*;

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Contact: Senior Manager Risk and Compliance

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- is an offence under any other law of the Commonwealth, which is punishable by 12 months or more in prison;
- is a danger to the public or the financial system; or
- is prescribed by regulations,

(together, **Reportable Conduct**).

Personal work-related grievances—like interpersonal conflicts with another employee— are not Reportable Conduct and should be reported in other ways. However, if the personal work-related grievance includes information about Reportable Conduct (for example, the conduct is also a danger to the public), it could qualify for protections under this Policy.

How to Report

Eligible Persons should disclose Reportable Conduct to an Internal Recipient or External Recipient (**Whistleblower Report**).

Individuals who are uncertain about whether a matter is Reportable Conduct or would like further information before submitting a Whistleblower Report, can contact an Eligible Recipient or raise their concerns through CCQ's Online Whistleblower portal.

Eligible Persons can make a Whistleblower Report confidentially or anonymously. They can choose to remain anonymous throughout the process, including over the course of any investigation and after the investigation is finalised. They may also decline to answer any questions that may reveal their identity.

If an Eligible Person chooses to remain anonymous, maintaining ongoing two-way communication with CCQ is important so that CCQ can ask follow-up questions or provide updates on any investigation, where appropriate.

Internal Recipients

Whistleblower Reports can be made to CCQ's Directors, Chief Executive Officer or other members of the Executive Team, either directly or through CCQ's Online Whistleblower portal.

External Recipients

Whistleblower Reports can also be made directly to:

- Australian Securities and Investments Commission (**ASIC**);
- any other prescribed Commonwealth body;
- a legal practitioner for the purpose of obtaining legal advice or representation about whistleblower laws;
- auditors of CCQ; and
- in limited circumstances, journalists or parliamentarians for a public interest or emergency disclosure. There are criteria for making public interest disclosures or emergency disclosures.

Protections

An Eligible Person who makes a report to an Internal or External Recipient under this Policy may qualify for statutory protections under the *Corporations Act*, including:

- **The right to have their identity protected, and the right to have the information provided as part of their report handled securely and confidentially.** It is against the law to reveal the identity of an Eligible Person. CCQ will only disclose information without the Eligible Person's consent in limited circumstances (for instance, if required for an investigation or by law or for the purposes of getting legal advice or representation). Eligible Persons can lodge a complaint with the Whistleblower Officer,

or a regulator for investigation, if they believe that confidentiality under this Policy has been breached.

- **The right to be protected from civil, criminal or administrative liability** (including disciplinary action) for making the report, from contractual or other remedies based on the report, and from the admissibility of the information provided in evidence against them.
- **The right to be protected from detrimental treatment or any form of victimisation** (for example, dismissal, harassment or intimidation, or discrimination). It is unlawful to cause detriment to another person on the belief or suspicion that they have, propose or intend to make a report. CCQ will take steps to prevent Eligible Persons from such treatment, which may include disciplinary action or other appropriate action.
- **The right to compensation and other remedies if they suffer loss, damage or injury** (for example, because CCQ did not take reasonable steps or care to prevent detrimental conduct suffered by the Eligible Person).
- **The right not to be required to reveal their identity before any court or tribunal.**

Eligible Persons can still be protected even if their report turns out to be mistaken, as long as they had reasonable grounds at the time to suspect there was misconduct.

Investigation Process

1. Once received, the Eligible Person's report will be reviewed and assessed to determine whether it qualifies as Reportable Conduct, whether the report appears credible and whether a formal investigation is required. CCQ is committed to dealing with all reports under this Policy promptly, fairly and objectively.
2. If the report qualifies as a Whistleblower Report, and it is appropriate to do so, CCQ will conduct an investigation. Most investigations are facilitated by the Whistleblower Officer or external investigators. The investigation process and timeframe will depend on the nature of the report and the amount of information provided.
3. Any employees mentioned in the Whistleblower Report will be given an opportunity to respond before any findings are made against them.
4. CCQ may provide Eligible Persons with general updates on the status and outcome of an investigation where appropriate and subject to confidentiality, legal obligations, and fairness considerations. Detailed findings or disciplinary outcomes will not be provided to Eligible Persons.

Support

Eligible Persons can access confidential counselling via CCQ's Employee Assistance Program (EAP) and ongoing support for during and after any investigations.

More Information

This Policy will be:

- published on CCQ's intranet and website;
- distributed to CCQ officers and employees upon induction; and
- provided to suppliers upon request.

Associated CCQ Documents

- Whistleblower Guideline
- Whistleblower Procedure
- Workplace Policy
- Grievance Guideline
- Code of Conduct
- Risk Management Policy
- Risk Management Framework

Human Services Quality Standards Indicators

- HSQS Indicators 1.1, 1.7, 4.3, 5.1, 5.2, 5.3 and 6.5

Revision History

This Policy may change with approval by the CCQ Board, with the current policy published on the intranet and CCQ's website.

Version	Date	Author	Description of Changes
1	9/12/2025	Senior Manager Risk and Compliance	New Policy

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Sponsor:

Contact:

Chief Financial Officer

Senior Manager, Risk and Compliance

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