

General Policy

At PIA, we expect our employees, volunteers and contractors to adhere to the highest standards of ethical and professional conduct, with honesty and integrity.

Whistleblowing is the act of reporting (disclosing) wrongdoing that is of legitimate concern. Whistleblowers need to know they can make reports safely, securely, and that they will be protected and supported in doing so.

It is important to PIA that people who become aware of wrongdoing feel empowered to report it and can do so with confidence, without fear of reprisal, or appearing disloyal. Often people working for, or with, PIA are the first to uncover suspected unethical, fraudulent or illegal conduct and PIA relies on those people to report it.

This policy is an important tool to help:

- encourage Whistleblowers to speak out without fear of intimidation, reprisal, or disadvantage
- explain the protection available to eligible Whistleblowers
- give PIA the framework to receive reports in a manner that ensures the report is handled appropriately and the Whistleblower is protected
- guide the manner of investigation
- ensure PIA complies with its statutory and regulatory obligations under the Corporations Act 2001 (Cth) (the Act).

This policy is made available on the public-facing policies page of the PIA website.

Definitions

For the purpose of this policy, the following definitions apply:

Whistleblowing – disclosure by (or for) a witness of actual or suspected wrongdoing

Whistleblower – a person who reports (discloses) wrongdoing in accordance with this policy

Report Receiver – a person to whom a Whistleblower reports wrongdoing in accordance with this policy.

Types of Wrongdoing

Covered by this policy

There are several types of wrongdoing, but not all of them are covered by this policy or qualify for protection under the Act. Some examples of wrongdoing covered by this policy are:

- illegal conduct such as fraud, theft, misappropriation of funds, financial irregularities
- negligence, breach of trust or duty
- bribery, threats of violence, use of illicit drugs
- failure to comply with regulatory requirements
- anything that suggests a significant risk to public safety, even if it does not breach law
- actual or threatening conduct against a person who has been or is suspected to be a whistleblower.

Even if a Whistleblower's report turns out to be incorrect, they can still qualify for protection.

Not covered by this policy

Personal work-related grievances are not covered by this policy and do not qualify for protection under the Act. Some examples of matters not covered are:

- interpersonal conflict between employees (unless the conflict involves threats or intimidation etc. due to a person being, or suspected of being, a Whistleblower)
- PIA decisions that do not breach workplace laws
- decisions and outcomes relating to the ordinary structuring of PIA or PIA's disciplinary processes.

Sometimes a Whistleblower's report may include a work-related grievance connected to a wrongdoing that is covered by the policy, in which case the relevant portion of the report may still be considered an eligible disclosure.

Work-related grievances should be raised following PIA's standard workplace practices.

Whistleblowers

Protections exist under the Act for people who qualify as eligible Whistleblowers and who disclose wrongdoing with reasonable grounds to believe it is true. An eligible Whistleblower is someone who is:

- a current or former officer or employee of PIA (including permanent, part-time, fixed-term or temporary employees, interns, secondees, managers and directors)
- a supplier to PIA (paid or unpaid) such as contractors, consultants, service providers
- a relative, dependant or spouse of any of the above.

To ensure that all employees are treated fairly and that resources are not wasted, protection is not available when the disclosure is trivial or vexatious in nature with no substance or are unsubstantiated allegations which are found to have been made maliciously.

Whistleblowers should ensure they have reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to PIA. Even if they may not have all the details leading to suspicion, they are still encouraged to report genuine concerns.

However, deliberate false reporting that the reporting person knows to be untrue will be considered an act of gross misconduct on the part of the reporter and PIA's Discipline and Termination Policy may apply.

Making a disclosure may not protect the Whistleblower from the consequences of their own involvement in a wrongdoing itself. Whistleblowers may be held liable for any personal misconduct revealed by their report or the investigation.

Although a Whistleblower may be implicated in the disclosed wrongdoing, they must not be threatened with, or be subjected to, retaliatory action or victimisation in reprisal for making a disclosure under this policy.

Report Receivers

Only certain people within and external to PIA are able to receive reports of wrongdoing. If a Whistleblower makes their report to a person other than one listed below, they may not be eligible for protection under the Act.

Ideally, reports would be made internally to PIA first to help PIA identify and address wrongdoing as early as possible.

The Report Receiver will provide support and protection to the Whistleblower in accordance with this policy.

Whistleblowers, or potential Whistleblowers, can also obtain their own independent legal advice.

People able to receive reports (Report Receivers) within PIA are:

- The Chief Executive Officer (CEO) or Chief Operating Officer (COO)
- PIA Officers (board directors including the National President)
- PIA's auditor (including a member of an audit team conducting an audit).

Whistleblowers can also report to ASIC or another Commonwealth body prescribed by regulation such as the ATO for tax-related whistleblowing.

For more information about reporting externally see [ASIC's Fact Sheet on how they handle whistleblowing reports](#) (link checked 12/5/2025).

How to Report

In the first instance, Whistleblowers are encouraged to report their concerns to PIA's CEO or COO. There may be a simple explanation surrounding the matter that the Whistleblower has not considered.

Where a Whistleblower is reluctant to make a report to the CEO or COO, they should make the report to the National President.

Reports can be made face to face, or by phone, email, or post (marked 'confidential'). A Whistleblower may feel more comfortable making a report outside of business hours and the Report Receiver must reasonably accommodate such a request. Whistleblowers must provide information to assist any inquiry or investigation of the wrongdoing disclosed.

Contact Details of PIA Report Receivers:

Chief Executive Officer (CEO)

Planning Institute of Australia
PO Box 5427
KINGSTON ACT 2604
Phone: 02 6262 5933
Email: ceo@planning.org.au

Chief Operating Officer (COO)

Planning Institute of Australia
PO Box 5427
KINGSTON ACT 2604
Phone: 02 6262 5933
Email: coo@planning.org.au

National President

Planning Institute of Australia
PO Box 5427
KINGSTON ACT 2604
Phone: 02 6262 5933
Email: president@planning.org.au

If the Whistleblower is reluctant to report to the CEO, COO or the National President, they may report to any of PIA's board directors. Staff and volunteers can request contact details for directors from the Board and Executive Coordinator or the Head of Finance and People.

Whistleblowers are encouraged to keep an open line of communication with PIA, to help with any follow-up questions or provide any more information.

Anonymity

Whistleblowers can choose to remain anonymous or use a pseudonym at all times while making a report, over the course of an investigation and after an investigation is finalised, and still be protected under the Act.

However, anonymous reports have significant limitations such as inhibiting the ability to provide feedback on outcomes or gather additional information to assist with or complete an inquiry or investigation. It may also become difficult to enforce specific protection mechanisms for the Whistleblower.

Protections

Not all disclosures or serious wrongdoing are protected at law. However, Whistleblowers who make disclosures to any Report Receivers under this policy have protections under the Act. Protections include:

- Identity protection (confidentiality) – Whistleblower’s identity and information likely to identify a Whistleblower must be protected.
- Protection from detrimental acts or omissions in relation to the disclosure – a Whistleblower cannot be threatened with dismissal, have their duties altered to their disadvantage, be discriminated against, harassed or intimidated, etc.

Further protections are provided under the Act (Part 9.4AAA).

Confidentiality

Report Receivers will:

- Handle reports in a confidential and secure manner
- Ensure the Whistleblower’s identity (including information that is likely to lead to their identification) is kept confidential as far as possible unless the Whistleblower has consented to the disclosure, and except where disclosure is permitted by law (for instance to ASIC, the Australian Federal Police or to a legal practitioner).

Some additional practices that may be used to increase protection of the Whistleblower’s identity include:

- Redacting all of the Whistleblower’s personal information from records pertaining to the report (for example, blacking-out the sender’s name and email address)
- Referring to the Whistleblower in gender-neutral language (for example, using ‘they, them, their’ instead of ‘he, his’ or ‘she, her’)
- If the Whistleblower has consented to their identity being disclosed, limiting this information to only the people directly involved in handling and investigating the report.

Protection against Victimisation

No person at PIA may cause or threaten any detriment to any person if that person is or proposes to be a Whistleblower, or is suspected, believed to be, or could be, a Whistleblower.

Detriment includes (but is not limited to):

- Dismissal
- Injury of an employee in their employment
- Alteration of an employee's position or duties to their disadvantage
- Discrimination, harassment or intimidation
- Harm or injury, including psychological harm
- Damage to property, reputation or business, or financial position
- Taking action against a Whistleblower to enforce a right (for example, a breach of confidentiality) or subjecting them to any liability or action simply because they have made a disclosure.

Investigating a Report

When a report of alleged or suspected wrongdoing is made under this policy the following steps must be followed except where, in the opinion of the Report Receiver, it would be inappropriate or unreasonable in the circumstances to do so:

- a. the Report Receiver must assess the matter and determine whether the report falls within the scope of this policy and, if it does and the Report Receiver determines it is necessary, commence inquiries and/or an investigation into the matters disclosed. The Report Receiver's objective should be to gather evidence relating to the claims made by the Whistleblower, which may either substantiate or refute the claims made
- b. the investigation must be conducted in an objective, fair and independent manner, and as is reasonable and appropriate having regard to the nature of the report and the circumstances. The Report Receiver should keep the Whistleblower informed at key stages during the investigation process
- c. the Report Receiver may second the expertise of other PIA officers or employees to assist in the investigation and may seek the advice of external experts as required
- d. where a person is identified as being suspected of possible wrongdoing, but preliminary inquiries determine that the suspicion is baseless or unfounded and that no formal investigation is warranted, the Whistleblower will be informed of this outcome and the matter laid to rest. The Report Receiver will determine whether or not the person named in the allegation should be informed that a suspicion was raised and found to be baseless upon preliminary review. This decision will be based on a desire to preserve the integrity of a person so named, so as to enable workplace harmony to continue unfettered and to protect the Whistleblower where it is a bona fide disclosure
- e. the Report Receiver must ensure that any person who has been adversely mentioned in information provided by the Whistleblower has a fair and reasonable opportunity to respond to the allegations made in respect of them prior to any adverse findings being made
- f. the Report Receiver, and all persons involved in an investigation, must keep the identity of a Whistleblower, or information likely to lead to their identification, confidential at all times except where allowed under this policy
- g. subject to confidentiality obligations under this policy, the Report Receiver must notify the Company Secretary about the status of any investigations underway, the outcomes of any investigations completed, and actions taken as a result of those investigations. The Company Secretary must inform the Board during regular Board reporting timeframes.

Non-Compliance with Policy

Non-compliance with this policy by any Report Receivers, employees or contractors will be taken seriously by PIA and may be subject to a separate investigation and/or disciplinary action.

Review

This policy should be reviewed at least every two years to ensure it remains current and effective.

Version Control

Authorising Entity: Chief Executive Officer

Version	Author	Revision Notes	Date Approved
1.	Brenda Payne	Original document	20 December 2019
2.	Brenda Payne	Clarified other directors in How to Report section	4 May 2020
3.		Spinach Ventures review	19 June 2023
3.1	Brenda Payne	Convert to new brand format and update role titles throughout. 12 May 2025.	
