

- **Burmese Community Development Collaboration (BCDC)**

WHISTLEBLOWING POLICY

Version 2.0

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1. Introduction

The Burmese Community Development Collaboration (BCDC) is committed to maintaining the highest standards of integrity, accountability, transparency, ethical conduct, safeguarding, and responsible organisational governance across all areas of its operations and activities.

BCDC recognises that individuals connected to the organisation, including staff, volunteers, Board members, contractors, consultants, partner representatives, and community stakeholders, may become aware of serious misconduct, unethical behaviour, safeguarding concerns, financial wrongdoing, abuse of authority, corruption, fraud, or other inappropriate conduct that could harm individuals, communities, organisational operations, or public trust.

BCDC further recognises that individuals may hesitate to report concerns if they fear retaliation, discrimination, intimidation, reputational harm, victimisation, or negative consequences for raising concerns in good faith.

This Whistleblowing Policy establishes a safe, confidential, accessible, and accountable framework for reporting suspected wrongdoing and protected disclosures within BCDC. The policy supports the organisation's commitment to promoting a culture in which concerns can be raised responsibly, respectfully, and without fear of retaliation.

This policy is intended to strengthen:

- Ethical organisational culture;
- Accountability and transparency;
- Safeguarding and protection systems;
- Financial integrity and fraud prevention;
- Organisational learning and continuous improvement;
- Safe reporting and escalation mechanisms.

The policy also supports BCDC's obligations and commitments under:

- The ACFID Code of Conduct;
- Safeguarding and PSEAH principles;
- ACNC Governance Standards;
- Relevant Australian legal and regulatory expectations;
- BCDC's internal governance and accountability systems.

2. Purpose of the Policy

The purpose of this policy is to:

- Provide a safe and confidential mechanism for reporting suspected wrongdoing or misconduct;
- Encourage individuals to report concerns in good faith;
- Protect whistleblowers from retaliation, intimidation, victimisation, or adverse treatment;
- Promote early identification and resolution of serious organisational concerns;
- Strengthen organisational accountability, integrity, and transparency;
- Support ethical decision-making and responsible governance practices;
- Ensure appropriate management, assessment, escalation, and investigation of reported concerns;
- Promote safeguarding, child protection, and PSEAH accountability;
- Support prevention and detection of fraud, corruption, financial misconduct, and abuse of authority.

This policy aims to ensure that BCDC personnel and stakeholders understand:

- What types of concerns may be reported;
- How to report concerns safely;
- How reports will be managed;
- What protections are available for whistleblowers;
- The responsibilities of individuals involved in the reporting and response process.

The policy also seeks to foster a culture in which:

- Individuals feel safe to speak up;
- Ethical concerns are addressed responsibly;
- Misconduct is not ignored or concealed;
- Organisational accountability is strengthened through transparency and responsible action.

3. Organisational Commitment

BCDC is committed to promoting an organisational culture that values:

- Integrity;
- Accountability;
- Respect;
- Transparency;
- Safeguarding;
- Ethical conduct;
- Protection from harm and exploitation.

BCDC recognises that effective whistleblowing systems are essential to maintaining safe, ethical, and accountable organisational environments.

Accordingly, BCDC is committed to:

- Supporting individuals who report concerns in good faith;
- Maintaining confidential and accessible reporting mechanisms;
- Taking concerns seriously and responding appropriately;
- Protecting whistleblowers from retaliation or victimisation;
- Managing reports fairly, respectfully, and sensitively;
- Applying survivor-centred and safeguarding-informed approaches where relevant;
- Ensuring that serious misconduct is appropriately reviewed and escalated;
- Promoting organisational learning and continuous improvement.

BCDC maintains zero tolerance for:

- Fraud and corruption;
- Sexual exploitation, abuse, or harassment;
- Child abuse or safeguarding violations;
- Abuse of authority or power;
- Retaliation against whistleblowers;
- Deliberate concealment of serious wrongdoing;
- Serious unethical or unlawful conduct.

4. Scope and Application

This policy applies to all individuals associated with BCDC, including:

- Board members;
- Employees and staff;
- Volunteers and interns;
- Consultants and contractors;
- Partner organisations and partner representatives;
- Community workers and facilitators;
- Beneficiaries and participants where applicable;
- Individuals engaged in BCDC-supported activities or operations.

This policy applies across:

- Organisational governance activities;
- Humanitarian and development programs;
- Settlement and community support services;
- Community engagement activities;
- Safeguarding and protection activities;
- Financial management and procurement processes;
- Partnership and operational arrangements;
- Online and digital engagement activities;
- Activities conducted within Australia and internationally.

This policy applies to reports relating to suspected:

- Fraud or corruption;
- Financial wrongdoing;
- Safeguarding violations;
- Child abuse or exploitation;
- Sexual exploitation, abuse, or harassment;
- Serious misconduct;
- Abuse of power or authority;
- Breaches of organisational policies or Code of Conduct;
- Serious unethical conduct;
- Retaliation against individuals raising concerns;
- Deliberate concealment of wrongdoing;
- Conduct that may seriously harm individuals, communities, or organisational integrity.

This policy does not replace:

- Standard workplace grievance procedures;
- Human resource management processes;
- Community complaints mechanisms;
- Safeguarding reporting obligations;
- Legal reporting requirements.

However, serious concerns identified through those mechanisms may also be managed under this policy where appropriate.

5. Definitions

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

Whistleblower

A whistleblower is a person who reports suspected wrongdoing, misconduct, unethical behaviour, safeguarding concerns, financial misconduct, abuse of authority, or other serious concerns in good faith under this policy. A whistleblower may include staff members, volunteers, Board members, contractors, consultants, partner representatives, community members, beneficiaries, participants, or other individuals connected to BCDC activities or operations.

Protected Disclosure

A protected disclosure refers to a report or disclosure of suspected wrongdoing made in good faith through appropriate reporting channels under this policy. Protected disclosures may relate to fraud, corruption, safeguarding violations, serious misconduct, abuse of power, financial wrongdoing, PSEAH concerns, serious unethical conduct, or other significant organisational concerns.

Wrongdoing

Wrongdoing refers to conduct that is unlawful, unethical, unsafe, abusive, dishonest, harmful, or inconsistent with BCDC's values, policies, safeguarding obligations, or Code of Conduct. Wrongdoing may include fraud, financial misconduct, safeguarding violations, abuse or exploitation, harassment, discrimination, abuse of authority, serious policy breaches, deliberate concealment of misconduct, or retaliation against whistleblowers.

Good Faith Reporting

Good faith reporting means that a person genuinely believes that the information they are reporting is true or reasonably suspected to be true at the time the disclosure is made, even if the concern is later not substantiated. A person is not required to prove wrongdoing before making a report under this policy.

Retaliation

Retaliation refers to any adverse action, intimidation, threat, discrimination, harassment, victimisation, dismissal, reputational harm, or unfair treatment directed toward a person because they made, supported, or participated in a protected disclosure. Retaliation against whistleblowers is strictly prohibited by BCDC.

Confidential Information

Confidential information refers to information related to a report, investigation, safeguarding concern, whistleblower identity, or organisational response process that must be protected from unauthorised disclosure or misuse. Such information must be handled securely and confidentially in accordance with organisational policies and safeguarding obligations.

Anonymous Report

An anonymous report is a disclosure made without identifying the person making the report. BCDC recognises that anonymous reporting may sometimes be necessary to support safe disclosure of concerns, particularly in safeguarding, PSEAH, financial misconduct, or other sensitive operational contexts.

Safeguarding Concern

A safeguarding concern refers to any concern involving child abuse, exploitation, sexual exploitation, abuse or harassment (PSEAH), harm to vulnerable individuals, unsafe conduct, or breaches of safeguarding obligations. Safeguarding concerns must be reported and managed promptly in accordance with BCDC safeguarding procedures and protection obligations.

Financial Wrongdoing

Financial wrongdoing refers to fraud, theft, corruption, bribery, misuse of organisational funds or resources, financial dishonesty, or unauthorised financial activities. Financial wrongdoing may also include procurement misconduct, falsification of financial records, or improper use of organisational assets and financial systems.

6. Types of Reportable Wrongdoing

BCDC encourages reporting of serious concerns and suspected wrongdoing that may negatively affect:

- Individuals or communities;
- Organisational integrity;
- Safeguarding obligations;
- Financial accountability;
- Ethical governance;
- Public trust and confidence.

Examples of reportable wrongdoing may include, but are not limited to:

Safeguarding and Protection Concerns

- Child abuse or exploitation;
- Sexual exploitation, abuse, or harassment;
- Grooming or inappropriate behaviour;
- Safeguarding policy breaches;
- Failure to report safeguarding concerns;
- Harm or neglect involving vulnerable individuals.

Financial Misconduct

- Fraud or corruption;
- Theft or misappropriation of funds;
- Bribery or dishonest financial practices;
- Procurement misconduct;
- Unauthorised financial transactions;
- Deliberate misuse of organisational resources.

Abuse of Authority or Misconduct

- Abuse of power or position;
- Serious unethical behaviour;
- Serious breaches of organisational policies;
- Harassment, discrimination, or victimisation;
- Serious conflicts of interest;
- Retaliation against whistleblowers.

Operational and Governance Concerns

- Deliberate concealment of misconduct;
- Serious negligence;
- Falsification of records or reports;
- Serious breaches of organisational accountability;
- Conduct that may seriously damage organisational integrity or public trust.

Security and Safety Concerns

- Serious threats to safety or wellbeing;
- Deliberate unsafe operational conduct;
- Serious security breaches;
- Conduct that places communities or personnel at risk.

Legal and Compliance Concerns

- Serious breaches of laws or regulations;
- Non-compliance with safeguarding obligations;
- Deliberate breaches of donor or compliance requirements;
- Conduct involving prohibited entities or sanctions violations.

The examples listed above are not exhaustive. Individuals are encouraged to report any serious concern where they reasonably believe misconduct, harm, abuse, or unethical conduct may have occurred.

7. Principles of Protected Disclosure

BCDC is committed to ensuring that protected disclosures are managed in a manner that is:

- Safe;
- Respectful;
- Fair;
- Confidential;
- Survivor-centred where relevant;
- Free from retaliation or victimisation.

The following principles apply to all protected disclosures under this policy.

Good Faith Reporting

Individuals are encouraged to raise concerns honestly and responsibly in good faith.

A person making a report:

- Does not need to have complete evidence;
- Does not need to prove wrongdoing;
- Is expected to provide information honestly and responsibly.

BCDC recognises that concerns raised in good faith may later prove to be unsubstantiated.

Fairness and Impartiality

Reports will be managed:

- Fairly;
- Responsibly;
- Objectively;
- Without bias or conflicts of interest.

BCDC will seek to ensure that individuals involved in assessment or investigation processes are appropriately independent and impartial.

Accountability and Appropriate Action

BCDC is committed to:

- Reviewing reported concerns appropriately;
- Taking proportionate action where necessary;
- Escalating serious concerns appropriately;
- Strengthening organisational systems where lessons are identified.

Safeguarding and Protection

Where safeguarding concerns are involved, protection from harm and survivor-centred approaches will be prioritised.

8. Confidentiality and Privacy

BCDC recognises that confidentiality and privacy are essential to maintaining safe and effective whistleblowing systems.

Accordingly, BCDC will take reasonable and appropriate steps to:

- Protect the identity of whistleblowers where possible;
- Maintain confidentiality of disclosures and investigations;
- Restrict access to sensitive information;
- Prevent unauthorised disclosure of reports;
- Protect affected individuals from unnecessary harm or exposure.

Information relating to disclosures will generally only be shared:

- On a need-to-know basis;
- For assessment or investigation purposes;
- To support safeguarding obligations;
- Where legally required;
- Where necessary to prevent serious harm or risk.

BCDC recognises that complete confidentiality may not always be possible where:

- Legal reporting obligations apply;
- Serious safeguarding concerns exist;
- Criminal conduct is identified;
- External investigation or regulatory involvement is required.

9. Anonymous Reporting

BCDC recognises that some individuals may feel unsafe, vulnerable, or uncomfortable identifying themselves when reporting suspected wrongdoing, safeguarding concerns, financial misconduct, or other serious organisational concerns.

Accordingly, BCDC permits anonymous reporting under this policy where appropriate.

Anonymous disclosures may be made regarding:

- Safeguarding concerns;
- Child protection concerns;
- Sexual exploitation, abuse, or harassment;
- Fraud or corruption;
- Serious misconduct;
- Abuse of authority;
- Serious ethical or operational concerns.

BCDC will take anonymous reports seriously and will assess them in accordance with organisational procedures and safeguarding obligations.

However, BCDC also recognises that anonymous reporting may:

- Limit the organisation's ability to seek clarification;
- Restrict investigation processes;
- Affect the ability to verify information;
- Limit direct communication with the reporter.

Despite these limitations, BCDC will make reasonable efforts to:

- Assess concerns objectively;
- Protect affected individuals;
- Respond proportionately to identified risks;
- Escalate serious matters appropriately.

10. Protection Against Retaliation

BCDC is committed to protecting individuals who make protected disclosures in good faith from retaliation, intimidation, victimisation, harassment, discrimination, or other adverse treatment.

Retaliation against whistleblowers is strictly prohibited.

This protection applies to individuals who:

- Make a report in good faith;
- Assist with an investigation;
- Provide information or evidence;
- Support whistleblowers or reporting processes;
- Participate in organisational review processes.

Examples of prohibited retaliation may include:

- Threats or intimidation;
- Harassment or bullying;
- Dismissal or demotion;
- Exclusion or discrimination;
- Reputational harm;
- Retaliatory complaints;
- Unfair treatment or victimisation;
- Abuse of authority or power.

BCDC will take reasonable and proportionate measures to:

- Protect whistleblower confidentiality;
- Reduce risks of retaliation;
- Monitor for retaliatory behaviour;
- Respond appropriately to retaliation concerns.

Individuals found to have engaged in retaliation may be subject to disciplinary or other organisational action.

11. Reporting Channels and Procedures

BCDC encourages individuals to report concerns as early as possible so that risks, misconduct, safeguarding issues, or operational concerns can be addressed appropriately. Reports may be made through one or more approved reporting channels depending on the nature and seriousness of the concern.

Internal Reporting Channels

Reports may be made to:

- Supervisors or managers;
- Executive leadership;
- Safeguarding Focal Persons;
- Board representatives;
- Complaint handling personnel;
- Designated whistleblowing contacts.

Where appropriate, individuals may bypass direct supervisors if:

- There is a conflict of interest;
- The supervisor is involved in the concern;
- The individual does not feel safe reporting through standard channels.

Reporting Methods

Reports may be submitted:

- Verbally;
- In writing;
- Through confidential reporting forms;
- By email;
- Through approved complaint or reporting mechanisms;
- Anonymously where appropriate.

Reports should include, where possible:

- Description of the concern;
- Date or timeframe;
- Individuals involved;
- Relevant supporting information;
- Immediate safeguarding or safety concerns.

BCDC recognises that individuals may not always be able to provide complete information when making a report.

Initial Assessment Process

Upon receiving a report, BCDC may:

- Record the disclosure confidentially;
- Conduct an initial assessment;
- Assess immediate safeguarding or operational risks;
- Determine escalation requirements;
- Identify appropriate response measures.

Serious concerns may require:

- Immediate safeguarding action;
- Emergency escalation;
- Referral to external authorities;
- Temporary protective measures.

12. Safeguarding and PSEAH Reporting

BCDC recognises that safeguarding concerns, including child safeguarding and PSEAH concerns, require particularly sensitive, timely, confidential, and survivor-centred responses. Safeguarding concerns may include:

- Child abuse or exploitation;
- Sexual exploitation, abuse, or harassment;
- Grooming or inappropriate behaviour;
- Harm to vulnerable individuals;
- Safeguarding policy breaches;
- Failure to report safeguarding concerns.

All safeguarding and PSEAH concerns should be reported immediately through approved safeguarding or whistleblowing channels.

BCDC prioritises:

- Safety and protection from further harm;
- Survivor-centred approaches;
- Confidentiality and dignity;
- Appropriate referral and support;
- Timely risk assessment and response.

Safeguarding concerns may require:

- Immediate escalation;
- Temporary protective measures;
- Referral to external authorities;
- Suspension of activities or personnel where appropriate;

Failure to report safeguarding concerns may constitute serious misconduct.

13. Financial Wrongdoing and Fraud Reporting

BCDC maintains zero tolerance for fraud, corruption, theft, bribery, financial dishonesty, misuse of resources, or other forms of financial wrongdoing.

Individuals are encouraged to report concerns relating to:

- Fraud or corruption;
- Theft or misappropriation of funds;
- Bribery or dishonest conduct;
- Procurement misconduct;
- Financial manipulation or falsification;
- Misuse of organisational assets or resources;
- Unauthorised financial activities;
- Deliberate concealment of financial misconduct.

Reports relating to financial wrongdoing may be made through:

- Management or Executive channels;
- Finance oversight personnel;
- Board representatives;
- Confidential whistleblowing channels.

BCDC will assess financial wrongdoing concerns seriously and may:

- Conduct internal financial reviews;
- Implement immediate financial controls;
- Restrict access to funds or systems;
- Escalate concerns to governance oversight structures;
- Seek external advice or investigation support where appropriate.

Serious financial misconduct may be referred to external authorities where legally required or operationally necessary.

14. Assessment and Investigation Process

BCDC is committed to ensuring that disclosures and reports made under this policy are managed in a timely, fair, confidential, and proportionate manner.

All reports will be assessed appropriately according to:

- The seriousness of the concern;
- Safeguarding or protection risks;
- Potential harm or impact;
- Operational and legal considerations;
- Available information and evidence;
- Urgency of response requirements.

Initial Assessment

Upon receiving a disclosure, BCDC may:

- Record the report confidentially;
- Assess immediate risks and safety concerns;
- Determine whether urgent safeguarding or protective action is required;
- Identify appropriate escalation pathways;
- Determine whether the concern falls within the scope of this policy.

Initial assessment may include consideration of:

- Risks to children or vulnerable individuals;
- Risks of ongoing harm;
- Financial or operational risks;
- Security concerns;
- Legal or compliance implications;
- Risks of retaliation or victimisation.

Immediate Protective Measures

Where necessary, BCDC may implement immediate measures to:

- Protect affected individuals;
- Prevent further harm;
- Maintain safeguarding obligations;
- Protect evidence or records;
- Reduce operational or financial risks.

Protective measures may include:

- Temporary suspension of activities;
- Temporary reassignment of personnel;
- Restricted access to systems or resources;
- Safeguarding referrals;
- Emergency escalation procedures.

Investigation Process

Where appropriate, BCDC may:

- Conduct an internal review or investigation;
- Appoint authorised personnel to manage the process;
- Seek external advice or specialist support;
- Refer matters to external authorities where legally required.

Investigations should be:

- Fair and impartial;
- Confidential;
- Proportionate to the seriousness of the concern;
- Survivor-centred where safeguarding concerns are involved;
- Conducted without conflicts of interest.

BCDC recognises that not all disclosures will result in formal investigations. In some cases, concerns may be addressed through:

- Risk mitigation measures;
- Informal resolution;
- Safeguarding interventions;
- Operational adjustments;
- Additional monitoring or supervision.

Escalation and Referral

Serious concerns may be escalated to:

- Executive leadership;
- Board representatives;
- Safeguarding focal persons;
- External authorities or regulators;
- Child protection agencies;
- Law enforcement where legally required.

BCDC may also seek external investigation support where:

- Independence is required;
- Specialist expertise is needed;
- Conflicts of interest exist;
- Safeguarding risks are particularly serious.

Outcome and Follow-Up

Following assessment or investigation, BCDC may:

- Implement corrective actions;
- Apply disciplinary or contractual measures;
- Strengthen safeguarding or financial controls;
- Review organisational systems and procedures;
- Monitor ongoing risks;
- Conduct follow-up reviews or monitoring.

Where appropriate and lawful, BCDC may provide limited feedback to whistleblowers regarding:

- Whether the matter has been reviewed;
- Whether appropriate action has been taken.

However, confidentiality, privacy, safeguarding, and legal obligations may limit the information that can be shared.

15. Responsibilities

All individuals associated with BCDC share responsibility for promoting ethical conduct, accountability, safeguarding, and responsible reporting practices.

Board Responsibilities

The Board is responsible for supporting ethical governance, accountability, oversight of serious organisational risks, and implementation of this policy.

Executive Responsibilities

Executive leadership is responsible for:

- Implementing this policy;
- Maintaining safe reporting mechanisms;
- Ensuring disclosures are assessed appropriately;
- Supporting confidential and fair processes;
- Escalating serious concerns appropriately;
- Supporting protection of whistleblowers.

Safeguarding Focal Person Responsibilities

Safeguarding personnel are responsible for:

- Supporting safeguarding-related disclosures;
- Managing safeguarding reporting processes;
- Supporting survivor-centred approaches;
- Escalating safeguarding concerns appropriately;
- Coordinating safeguarding response measures.

Managers and Supervisors

Managers and supervisors are expected to:

- Support safe reporting environments;
- Respond appropriately to concerns raised;
- Escalate serious concerns promptly;
- Maintain confidentiality obligations;
- Prevent retaliation or victimisation.

Staff, Volunteers, and Personnel

All personnel associated with BCDC are expected to:

- Act ethically and responsibly;
- Report suspected wrongdoing in good faith;
- Cooperate with assessment or investigation processes;
- Respect confidentiality obligations;
- Support safeguarding and accountability systems.

Partner Responsibilities

Partner organisations and representatives are expected to:

- Follow relevant reporting obligations;
- Cooperate with safeguarding and investigation processes;
- Report serious concerns responsibly;
- Support ethical and accountable operational practices.

16. Malicious or False Reports

BCDC encourages individuals to report concerns honestly and in good faith.

The organisation recognises that:

- Reports made in good faith may later prove to be unsubstantiated;
- A person does not need complete evidence before making a disclosure;
- Honest mistakes or misunderstandings may occur.

Individuals who make disclosures in good faith will not be penalised solely because:

- The concern could not be substantiated;
- An investigation does not confirm wrongdoing;
- The concern was based on reasonable suspicion.

However, BCDC does not tolerate knowingly false, malicious, intentionally misleading, or deliberately harmful reports.

Examples may include:

- Fabricated allegations;
- Deliberate misuse of reporting systems;
- Intentionally false accusations;
- Reports made primarily to harm, intimidate, or retaliate against others.

Where malicious or intentionally false reporting is identified, BCDC may:

- Conduct further review;
- Implement disciplinary or corrective measures;
- Restrict misuse of reporting mechanisms;
- Take other proportionate organisational action where appropriate.

BCDC will seek to ensure that responses to malicious reporting:

- Remain fair and proportionate;
- Do not discourage good faith reporting;
- Continue to support safe reporting environments.

17. Documentation and Record Keeping

BCDC is committed to maintaining accurate, secure, and confidential records relating to disclosures, assessments, investigations, safeguarding concerns, and organisational responses.

Records may include:

- Disclosure reports;
- Incident or safeguarding records;
- Investigation documentation;
- Risk assessments;
- Escalation records;
- Corrective action records;
- Monitoring and follow-up documentation.

All records should:

- Be stored securely;
- Be protected from unauthorised access;
- Be handled confidentially;
- Be accessible only to authorised personnel;
- Be maintained in accordance with organisational privacy and safeguarding obligations.

Sensitive safeguarding and whistleblowing information should be managed carefully to:

- Protect affected individuals;
- Protect whistleblower confidentiality;
- Prevent unnecessary disclosure;
- Support survivor-centred approaches where relevant.

BCDC recognises that certain records may also:

- Support governance oversight;
- Inform organisational learning;
- Contribute to risk management and safeguarding improvements;
- Support legal or compliance obligations.

Where appropriate, records may be retained in accordance with:

- Organisational record-keeping procedures;
- Safeguarding requirements;
- Financial accountability obligations;
- Relevant legal and regulatory expectations.

Access to whistleblowing-related records should be restricted to individuals with legitimate operational, safeguarding, governance, or legal responsibilities.

18. Monitoring and Review

BCDC recognises that effective whistleblowing systems require ongoing monitoring, review.

The organisation will seek to monitor:

- Effectiveness of reporting mechanisms;
- Accessibility of reporting channels;
- Trends in reported concerns;
- Timeliness of responses and investigations;
- Safeguarding and PSEAH reporting practices;
- Risks of retaliation or victimisation;
- Organisational compliance with this policy;
- Emerging operational or governance risks.

Monitoring activities may include:

- Internal governance reviews;
- Safeguarding monitoring;
- Incident trend analysis;
- Risk management reviews;
- Staff and volunteer feedback;
- Organisational learning processes;
- Review of corrective actions and mitigation measures.

BCDC may also review:

- Whether whistleblowers feel safe reporting concerns;
- Whether retaliation risks are being appropriately managed;
- Whether reporting pathways remain culturally appropriate and accessible;
- Whether safeguarding obligations are effectively integrated into reporting systems.

Findings from monitoring and review activities may inform:

- Policy improvements;
- Additional safeguarding measures;
- Organisational training needs;
- Risk management improvements;
- Governance strengthening measures;
- Improvements to reporting and investigation processes.

The organisation is committed to fostering a culture of:

- Ethical accountability;
- Continuous learning;
- Responsible governance;
- Safe and respectful reporting environments.

19. Related Policies and Procedures

This policy should be read together with other relevant BCDC governance, safeguarding, accountability, and operational documents, including but not limited to:

- Code of Conduct;
- Child Safeguarding Policy;
- PSEAH Policy;
- Complaint Handling Policy;
- Financial Wrongdoing Policy;
- Risk Management Policy;
- Privacy Policy;
- Human Resources Management Policy;
- Volunteer Manual;
- Due Diligence Procedures;
- Conflict of Interest Policy;
- PMEL Policy;
- Emergency and Crisis Management procedures.

20. Review and Update Process

This policy should be reviewed periodically to ensure that it remains:

- Effective;
- Operationally appropriate;
- Safeguarding-informed;
- Legally and ethically appropriate;
- Aligned with organisational governance obligations;
- Consistent with ACFID requirements and sector good practice.

The policy may be reviewed:

- Annually;
- Following serious incidents or disclosures;
- Following safeguarding or PSEAH concerns;
- Following major organisational or operational changes;
- Following legal or regulatory developments;
- Following governance or compliance reviews.

The review process may consider:

- Organisational learning and feedback;
- Effectiveness of reporting mechanisms;
- Accessibility and confidentiality of reporting systems;
- Risks of retaliation;
- Emerging safeguarding and operational risks;
- Monitoring and investigation findings;
- Stakeholder and community feedback where appropriate.

Updates to this policy may be approved through relevant governance or management processes in accordance with BCDC's governance arrangements.

BCDC is committed to continuously strengthening:

- Ethical governance systems;
- Safe reporting mechanisms;
- Safeguarding accountability;
- Protection of whistleblowers;
- Organisational transparency and integrity;
- Prevention-focused organisational culture.

21. Appendices

- Appendix A – Whistleblower Disclosure Form
- Appendix B – Confidentiality and Protection Measures



Appendix A – Whistleblower Disclosure Form

Burmese Community Development Collaboration (BCDC)

Confidential Whistleblower Disclosure Form

Important Information

This form is intended to support the confidential reporting of suspected wrongdoing, misconduct, safeguarding concerns, financial misconduct, abuse of authority, or other serious organisational concerns in accordance with the BCDC Whistleblowing Policy.

Reports may be submitted:

- With identification details; or
- Anonymously where appropriate.

BCDC will take reasonable steps to:

- Protect confidentiality;
- Prevent retaliation;
- Manage reports fairly and responsibly;
- Support safeguarding and protection obligations.

Part A – Reporter Information (Optional)

Item	Details
Full Name	
Position / Relationship to BCDC	
Organisation / Department	
Contact Number	
Email Address	
Preferred Method of Contact	
Would you like to remain anonymous where possible?	Yes / No



Part B – Disclosure Information

Item	Details
Date of Report	
Type of Concern	
Location of Incident or Concern	
Date / Time of Incident (if known)	
Individuals Involved	

Part C – Nature of the Concern

Please describe the concern in detail, including:

- What happened;
- Who was involved;
- When and where the incident occurred;
- How you became aware of the concern;
- Any immediate risks or safeguarding concerns.



Part D – Type of Reportable Concern

Please tick all relevant categories.

Concern Type	Tick
Fraud or Corruption	
Financial Misconduct	
Safeguarding Concern	
Child Protection Concern	
Sexual Exploitation, Abuse or Harassment (PSEAH)	
Abuse of Authority	
Harassment or Discrimination	
Serious Misconduct	
Serious Policy Breach	
Conflict of Interest	
Security or Safety Concern	
Legal or Compliance Concern	
Retaliation Against Whistleblower	
Other Serious Concern	

Part E – Supporting Information

Please provide any supporting information available.

Supporting Information	Details
Witnesses or Other Persons Involved	
Relevant Documents or Evidence Available	
Has the concern been reported elsewhere?	Yes / No
If yes, please provide details	



Part F – Immediate Risk Assessment

Question	Yes	No	Comments
Is there an immediate safeguarding risk?			
Is anyone currently at risk of harm?			
Does the concern involve children or vulnerable individuals?			
Is urgent action required?			
Is confidentiality particularly important in this case?			

Part G – Confidentiality and Protection Request

Request	Tick
I request confidentiality regarding my identity	
I request that this matter be handled sensitively	
I request protection from retaliation or victimisation	
I prefer communication through confidential channels only	

Part H – Declaration

I confirm that the information provided in this disclosure is true and accurate to the best of my knowledge and belief. I understand that BCDC will assess this report in accordance with organisational policies and procedures.

Name	Signature	Date



Part I – Internal Use Only

Item	Details
Report Received By	
Date Received	
Reference Number	
Initial Risk Level	Low / Moderate / High / Critical
Immediate Action Required	
Referred To	
Follow-Up Action	
Outcome / Status	

Confidentiality Notice

This document contains confidential and potentially sensitive information. Access should be restricted to authorised personnel only and managed in accordance with BCDC safeguarding, privacy, and whistleblowing obligations.



Appendix B – Confidentiality and Protection Measures

Burmese Community Development Collaboration (BCDC)

Confidentiality and Protection Measures

BCDC is committed to protecting the confidentiality, dignity, safety, and wellbeing of individuals who report concerns under the Whistleblowing Policy. All disclosures, reports, investigations, and related information must be managed responsibly, securely, and in accordance with safeguarding, privacy, and organisational accountability obligations.

1. Confidentiality Principles

BCDC will take reasonable and proportionate steps to:

- Protect the identity of whistleblowers where possible;
- Prevent unauthorised disclosure of sensitive information;
- Restrict access to reports and investigation records;
- Maintain secure handling of safeguarding and whistleblowing information;
- Protect affected individuals from unnecessary harm or exposure.

Information relating to disclosures should only be shared:

- On a need-to-know basis;
- For assessment or investigation purposes;
- To support safeguarding or legal obligations;
- Where necessary to prevent serious harm or risk.

2. Protection of Whistleblowers

BCDC strictly prohibits retaliation against any individual who:

- Makes a protected disclosure in good faith;
- Participates in an investigation or review process;
- Provides information or evidence;
- Supports a whistleblower or reporting process.

Protection measures may include:

- Confidential handling of reports;



- Restricted access to information;
- Safe communication arrangements;
- Protection from intimidation or victimisation;
- Temporary operational adjustments where appropriate;
- Safeguarding support measures where required.

3. Anonymous Reporting Protection

BCDC recognises that anonymous reporting may sometimes be necessary to support safe disclosure of concerns.

Where anonymous reports are submitted:

- The organisation will assess the concern seriously and fairly;
- Reasonable efforts will be made to maintain anonymity;
- Access to sensitive information will be restricted;
- The report will be managed confidentially and responsibly.

4. Access Control and Information Security

Whistleblowing-related information must:

- Be stored securely;
- Be protected from unauthorised access;
- Be handled confidentially;
- Be accessible only to authorised personnel;
- Be retained in accordance with organisational policies and legal obligations.

Sensitive information should not be:

- Shared unnecessarily;
- Discussed in inappropriate settings;
- Distributed outside authorised processes;
- Used for retaliation or personal advantage.

5. Safeguarding and Survivor Protection

Where safeguarding or PSEAH concerns are involved, BCDC will prioritise:

- Protection from further harm;



- Confidentiality and dignity;
- Survivor-centred approaches;
- Respectful and sensitive communication;
- Appropriate referral and support mechanisms.

Additional protection measures may be implemented where:

- Children or vulnerable individuals are involved;
- Serious safeguarding risks exist;
- There are concerns regarding intimidation or retaliation;
- Emergency protection measures are required.

6. Retaliation Prevention Measures

BCDC may implement measures to reduce retaliation risks, including:

- Monitoring workplace or operational environments;
- Restricting unnecessary disclosure of identities;
- Escalating retaliation concerns promptly;
- Providing management oversight;
- Applying disciplinary action where retaliation occurs.

Retaliation against whistleblowers or affected individuals may constitute serious misconduct.

7. External Disclosure and Legal Obligations

BCDC recognises that confidentiality may sometimes be limited where:

- Legal reporting obligations apply;
- Serious criminal conduct is identified;
- Child protection reporting obligations exist;
- External authorities or regulators require disclosure;
- Immediate safety or safeguarding risks are present.

Where possible and appropriate, BCDC will seek to manage disclosures responsibly and minimise unnecessary exposure of sensitive information.



8. Responsibilities of Personnel

All individuals involved in whistleblowing, safeguarding, complaint handling, or investigation processes are expected to:

- Respect confidentiality obligations;
- Handle information responsibly;
- Protect whistleblowers and affected individuals;
- Avoid retaliation or victimisation;
- Follow organisational safeguarding and privacy procedures.

Failure to maintain confidentiality appropriately may result in disciplinary or corrective action.

9. Monitoring and Review

BCDC may periodically review confidentiality and protection measures to ensure:

- Safe reporting mechanisms remain effective;
- Confidentiality systems remain appropriate;
- Retaliation risks are managed effectively;
- Safeguarding obligations are maintained;
- Organisational practices remain aligned with ACFID requirements and sector good practice.