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# VQ Whistleblower Policy

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Policy:	Whistleblower Policy
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Approved by:	VQ Board Members
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## 1. Purpose

This policy establishes the framework for enabling and protecting individuals who report suspected wrongdoing, unethical conduct, or breaches of legal obligations within Volleyball Queensland (VQ). The policy ensures all disclosures are managed with confidentiality, integrity, and in accordance with legislative requirements.

VQ is committed to fostering a culture of transparency, accountability, and ethical practice where individuals feel safe to raise genuine concerns without fear of reprisal or detriment.

## 2. Scope

This policy applies to all disclosures made by:

- Employees (including permanent, temporary, casual, and fixed term)
- Volunteers
- Board of Management members
- Students on placement
- Contractors, consultants, and suppliers
- Members and participants
- Former employees and associates of VQ
- Relatives and dependents of any of the above people

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This policy covers disclosures relating to:

- Breaches of legislation, regulation, or organisational policy

- Fraud, corruption, or misappropriation of funds or resources
- Conduct representing danger to public health or safety
- Conduct representing danger to children or vulnerable persons
- Unethical behaviour or practices
- Harassment, bullying, or discrimination
- Misconduct or improper conduct by employees, volunteers, or Board members
- Retaliation or victimisation against a person who has made or proposes to make a disclosure
- Information that suggests concealment of any of the above matters

This policy does not cover:

- Personal work related grievances that affect the discloser personally and do not have broader implications (these should be raised through the VQ Complaints Handling Procedure)
- Matters that are solely related to personal employment matters such as terms and conditions of employment
- Disclosures that are not made in good faith or are deliberately false or misleading

### 3. Legislative Framework and Compliance

- Public Interest Disclosure Act 2010 (Qld)
- Associations Incorporation Act 1981 (Qld)
- Fair Work Act 2009 (Cth)
- Privacy Act 1988 (Cth)
- Work Health and Safety Act 2011 (Qld)

### 4. Definitions

Term	Definition
Whistleblower	A person who makes a disclosure under this policy about suspected wrongdoing or misconduct.

Term	Definition
Disclosure	A report made by a whistleblower regarding information that the discloser has reasonable grounds to suspect indicates wrongdoing.
Disclosable Matter	Information that the discloser has reasonable grounds to suspect concerns misconduct, an improper situation, or circumstances in relation to VQ or any of its employees.
Whistleblower Protection Officer	The designated person responsible for receiving, managing, and investigating disclosures made under this policy.
Detriment	Any disadvantage, adverse action, or victimisation including dismissal, demotion, harassment, discrimination, damage to reputation, or any other unfair treatment.
Good Faith	A disclosure made with honest intention based on a reasonable belief that the information disclosed is true, without malicious or vexatious intent.
Reasonable Grounds	Having a genuine belief based on objective circumstances that the information being disclosed indicates wrongdoing, even if it subsequently proves to be incorrect.
Natural Justice	The fundamental principles of procedural fairness that ensure fair treatment in decision making processes.

## 5. Principles

VQ is committed to the following principles in relation to whistleblower protections:

- The identity of whistleblowers will be protected and kept confidential to the fullest extent possible under law, subject to the need to conduct proper investigation and comply with legal requirements.
- Whistleblowers will be protected from any form of retaliation, victimisation, or adverse treatment as a result of making a disclosure in good faith.
- All parties involved in a disclosure, including the whistleblower and any person who is the subject of a disclosure, will be treated fairly and in accordance with principles of natural justice.
- Multiple channels are available for making disclosures to ensure accessibility for all individuals, including options for anonymous reporting.

- Whistleblowers will be kept informed of the progress and outcome of investigations where possible and appropriate, whilst maintaining confidentiality obligations.
- VQ will ensure that disclosures are properly investigated and that appropriate action is taken where wrongdoing is substantiated.
- Whistleblowers will be offered appropriate support throughout the disclosure and investigation process.

## **6. Roles and Responsibilities**

### **6.1. Board of Management**

The Board of Management is responsible for:

- Endorsing and approving this policy
- Appointing the CEO as the Whistleblower Protection Officer or an appropriate external representative
- Ensuring organisational culture supports ethical conduct and safe disclosure of wrongdoing
- Receiving reports on whistleblower matters as appropriate
- Monitoring the effectiveness of whistleblower protections as appropriate

### **6.2. Chief Executive Officer**

The Chief Executive Officer is responsible for:

- Implementing this policy
- Ensuring all employees and volunteers are aware of this policy
- Fostering a culture where individuals feel safe to raise concerns
- Ensuring no person suffers detriment for making a disclosure in good faith
- Taking appropriate action in response to substantiated disclosures
- Maintaining confidentiality of disclosures
- Reporting to the Board of Management on whistleblower matters as required
- Maintaining the role of Whistleblower Protection Officer or appointing an appropriate external representative

### 6.3. Whistleblower Protection Officer

The Whistleblower Protection Officer is responsible for:

- Receiving and acknowledging disclosures made under this policy
- Seeking appropriate external support where appropriate
- Assessing whether a disclosure qualifies for protection under relevant legislation
- Managing investigations in accordance with this Policy
- Maintaining confidentiality and protecting the identity of whistleblowers
- Keeping whistleblowers informed of progress where appropriate
- Ensuring persons who are the subject of disclosures are afforded natural justice
- Maintaining secure records of all disclosures and investigations
- Identifying and addressing any instances of retaliation or victimisation
- Referring matters to external authorities where required by law

The Whistleblower Protection Officer at VQ is the CEO or a may be an external authority who is appointed by the Board of Management or the CEO, determined on a case-by-case basis.

### 6.1. Employees and Volunteers

All employees and volunteers are responsible for:

- Familiarising themselves with this policy
- Reporting suspected wrongdoing or misconduct through appropriate channels
- Making disclosures in good faith and based on reasonable grounds
- Maintaining confidentiality regarding any disclosure they become aware of
- Cooperating with investigations conducted under this policy
- Not engaging in any form of retaliation or victimisation against whistleblowers
- Supporting a workplace culture that encourages ethical conduct and safe disclosure

## 7. Protection for Whistleblowers

VQ provides the following protections to individuals who make disclosures in good faith:

Protection Type	Description
Identity Protection	The identity of the whistleblower will be kept confidential unless the whistleblower consents to disclosure, disclosure is required by law, or

Protection Type	Description
	disclosure is necessary to ensure natural justice for a person who is the subject of the disclosure.
Protection from Detriment	No person will suffer detriment for making a disclosure or for supporting another person to make a disclosure. Any person who causes detriment to a whistleblower will be subject to disciplinary action.
Immunity from Liability	Whistleblowers who make protected disclosures are immune from civil, criminal and administrative liability for making the disclosure. This immunity does not extend to conduct revealed in the disclosure itself.
Compensation and Remedies	Whistleblowers who suffer detriment because of making a disclosure may seek compensation and other remedies through legal avenues.
Support Services	VQ will provide access to support services where appropriate.

## 8. How to Make a Disclosure

Disclosures may be made through the following channels:

### Disclosure to Whistleblower Protection Officer

Email: [ceo@vq.org.au](mailto:ceo@vq.org.au)

Phone: 07) 3367 2844

Mail: c/- Sports House, Suite 2.12, 150 Caxton Street, Milton QLD 4064

### Anonymous Disclosure

Anonymous disclosures may be made via written correspondence marked 'Confidential' to the postal address above. Note that anonymous disclosures will significantly limit the ability to provide feedback or seek additional information during investigation.

### External Bodies

Disclosures may also be made to external bodies including:

- Queensland Ombudsman
- Crime and Corruption Commission Queensland
- Queensland Police Service
- Queensland Human Rights Commission

- Fair Work Commission
- Sport Integrity Australia
- Other regulatory bodies with jurisdiction over the matter disclosed

## 9. Investigation Process

The following procedures apply to disclosures:

- Acknowledgement of disclosure within 2 business days
- Initial assessment to determine if the disclosure qualifies for protection
- Conduct of thorough, objective, and timely investigation
- Application of natural justice principles to all parties
- Documentation of all steps taken during investigation
- Provision of feedback to whistleblower where appropriate and possible
- Implementation of recommendations and corrective actions
- Secure record keeping in accordance with privacy obligations

Detailed procedures for handling disclosures are outlined in the Whistleblower Procedure document.

## 10. Breach of Policy

Breaches of this policy, including retaliation against whistleblowers, disclosure of whistleblower identity without authorisation, or making false or vexatious disclosures, will be treated seriously and may result in:

- Disciplinary action up to and including termination of employment or engagement
- Referral to external authorities including police where criminal conduct is suspected
- Civil action for damages
- Report to relevant regulatory bodies

## 11. Review

This policy will be reviewed every two years, or earlier following legislative or governance changes, or operational changes within VQ.

## **12. Related Policies and Documents**

This policy is to be read in conjunction with:

- VQ Code of Conduct
- VQ Complaints Handling Procedure
- VQ Conflict of Interest Policy
- VQ Privacy Policy