

# ACAM Whistle Blower Policy

**POLICY NUMBER/  
REFERENCE:** 19-250723

**POLICY TITLE:** ACAM Whistle Blower Policy

## **POLICY STATEMENT:**

ACAM CPD Home membership is available to non-exempt medical practitioners in Australia at [www.acam.org.au](http://www.acam.org.au). It is not limited to members and fellows of ACAM but is open to those whose academic and clinical practice are aligned with the Australasian College of Aesthetic Medicine.

## **Objective**

The objective of this policy is to encourage and support those aware of or suspect a wrongdoing to report it, and to provide reassurance to those who do the CPD Home, management is committed to protecting their dignity, well-being, career, and good name.

## **DEFINITIONS:**

### **Purpose**

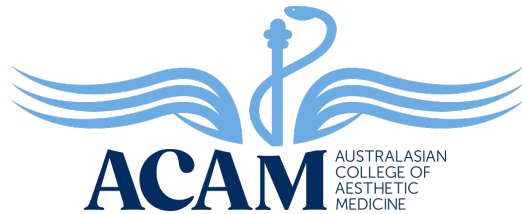
The ACAM CPD Home Whistle blower Protection Policy (policy) is one of a number of policies and codes that promotes a culture of conducting our business with honesty, fairness, and integrity. The aims of our policy are to:

- reinforce ACAM CPD Home and associated organisation's commitment to identifying and responding to concerns and fostering a culture of continuous improvement
- encourage the reporting of suspected or actual wrong doing
- provide guidance on how to raise concerns and how those concerns will be investigated
- reassure anyone who raises a concern that they can do so without fear of retaliation, even if they turn out to be mistaken.

### **Scope**

This policy applies to:

- ACAM Board members, full members and fellows;
- ACAM CPD Advisory Panel members;
- all representatives, including managers and supervisors; job candidates; student placements, trainees, contractors, sub-contractors, volunteers, and former employees;
- subscribers and Certified Course Merchant Providers; and
- any spouse, relative or dependant of any of the people listed above.



ACAM CPD Home encourages anyone with knowledge or reasonable suspicion of reportable conduct to report it as soon as possible.

## **PROCEDURES:**

### **1. Making a report**

Whistle blowers when notifying of a reportable conduct are requested to provide as much information as possible and any known details about the events underlying the report (e.g., date, time, location, name of person(s) involved, possible witnesses to the events, evidence of the events (e.g., documents, emails) and steps they may have already taken to report the matter elsewhere or to try resolve the concern).

To help facilitate investigation of the reportable conduct the whistle blower is encouraged to provide their name and a method for contacting them. This will enable the whistle blower Investigation Officer to contact the whistle blower if they have any additional question and to update them on the progress of the investigation.

There is no requirement for a whistle blower to identify themselves for their disclosure to qualify for protection under the Corporations Act or the Taxation Administration Act. Anonymous reports will be treated as seriously as any other allegation, but investigations may be limited if the person making the report is unable or unwilling to be interviewed. Any whistle blower wishing to remain anonymous is encouraged to use an anonymous email address to facilitate communication regarding the investigation of the matter.

ACAM's policy does not in any way restrict or diminish the right of any individual to make disclosures directly to relevant regulators.

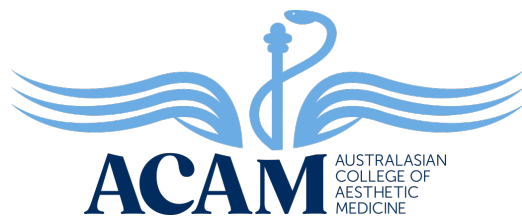
### **2. Reporting channels**

ACAM CPD Home has several reporting channels. Employees are encouraged to use normal business channels first for issues relating to their own personal circumstances (e.g., employment matters), or where normal business procedures exist (e.g., operational risk or compliance issues), except where a whistle blower believes they may suffer personal disadvantage or wish to use the protections under this policy. Our policy establishes a dedicated whistleblowing channel in addition to those listed above.

The alternate whistleblowing channel is to contact one of two Whistle blower Protection Officer's, those currently being:

- ACAM Association Manager; and the
- ACAM Chief Financial Officer.

Should either of the above be implicated directly or indirectly in the whistle blower's intended report they should instead report the matter to the [president@acam.org.au](mailto:president@acam.org.au).



### **3. Investigating reports**

Investigations of reportable conduct will be conducted in a manner that is confidential, fair, and objective. Confidentiality extends to all information received from whistle blowers. All information will be held securely and in strict confidence. All reports received through whistleblowing channels are assigned to a suitable whistle blower Investigation Officer.

### **4. Whistle blower protection**

ACAM CPD Home will not disclose the identity of or any information likely to identify the whistle blower unless:

- the whistle blower gives their consent;
- the disclosure is required by law, or where ACAM CPD Home refers the matter to regulatory body;
- the disclosure is necessary as part of the investigation process, including for the purposes of obtaining legal advice.

Whistle blowers will be protected from personal disadvantage or victimisation by ACAM CPD Home and ACAM representative staff and/or decision makers, from having made a report. This protection extends to anyone else within or outside of the organisation who is assisting the investigation, as well as to the Whistle blower Investigation Officer.

ACAM CPD Home will not tolerate any retaliatory action against a whistle blower including:

- dismissal or termination of services;
- demotion, reduction of responsibilities or duties;
- denial of access to services or processes to which they have a right
- any form of discrimination or harassment; and
- current or future bias or threats of any kind.

Any retaliatory action will be treated seriously and may be considered a serious misconduct resulting in disciplinary action, which may include termination of employment or position within ACAM CPD Home.

*Note: This policy does not prevent the whistle blower being subject to:*

- *regular performance review or any reasonable management action, carried out in a reasonable manner, to manage their conduct or performance; or*
- *regular audit processes, if a ACAM CPD Home prescriber; or*
- *the consequences of any involvement in the reportable conduct disclosed.*

### **Roles and Responsibilities**

The whistle blower when making a report must do so with a genuine and reasonable belief regarding the reportable conduct. The Whistle Blower Investigation Officer will be appointed by the ACAM Association Manager and will not be an individual implicated directly or indirectly in the report. The Whistle Blower Investigation Officer is responsible for



conducting the investigation, and for keeping the whistle blower informed of the investigation's progress in a timely way.

- The Whistle blower Protection Officer will be either the ACAM Association Manager or the ACAM Chief Financial Officer provided they are not implicated directly or indirectly in the report. The Whistle blower Protection Officer is responsible for protecting whistle blowers from personal disadvantage as a result of making a report. The Whistle blower Protection Officer is authorised to provide certain protections where he/she deems appropriate for fulfilling their role. Anyone covered by our policy can approach the Whistle blower Protection Officer prior to, during, or after making a whistleblowing report to seek advice.
- In the case of representatives, Human Resources services will maintain processes to monitor the welfare of whistle blowers under this policy, to ensure the effectiveness of protections offered under the policy.
- In the case of ACAM CPD Home subscribers, member or fellow or certified course merchant providers, the ACAM Association Manager when communicating with the whistle blower will check with them to ensure no retaliatory action has occurred.

### **Action**

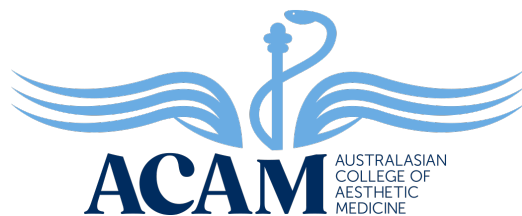
All reports of alleged or suspected reportable conduct received by the Whistle blower Investigation Officer will be assessed to ascertain the seriousness of the report and to determine whether an investigation is required. Factors relating to the seriousness may include, but are not limited to:

- the gravity of the conduct itself;
- the context in which the conduct occurred;
- the extent of the potential or actual consequence(s); and
- the potential to expose systematic wrongdoing beyond the allegation made.

The Whistle blower Investigation Officer may decide not to investigate a report if it is considered that the alleged conduct is not reportable conduct under this policy:

- report is not made in good faith or is frivolous, vexatious or malicious.
- report is made anonymously and there is insufficient information to undertake an investigation.
- subject matter of the report has been or could be satisfactorily dealt with or resolved through another grievance or reporting procedure.

An investigation will generally be conducted if the matter is deemed to be serious. The Whistle blower Investigation Officer will determine the appropriate process for conducting the investigation. This may include whether an external investigator is warranted or where the reportable conduct is a criminal nature, the matter may be referred directly to the ACAM CPD Home legal counsel and/or appropriate authorities.



All investigations will be conducted in a fair, independent and timely manner that affords procedural fairness to all involved.

On completion of an investigation, a written report will be provided to the ACAM Association Manager and Board or if that is not appropriate to the ACAM President.

**The report should:**

- summarise the conduct of the investigation;
- summarise the evidence collected;
- detail any conclusions drawn; and
- make recommendations for the response of ACAM Association Manager, or if that is not appropriate to the ACAM President.

The ACAM Association Manager or if inappropriate, the ACAM President will communicate the outcome of the investigation and any action to be taken by the ACAM CPD Home in response. ACAM CPD Home will take any action appropriate, internally or externally, for addressing any wrongdoing. This may include any necessary disciplinary action of ACAM CPD Home representatives, referrals to external regulatory bodies, reviewing CPD Home policies and processes to prevent a re-occurrence of the reportable conduct.

**Compliance**

- If it is found that the Whistle blower has knowingly made a false or vexatious report then that conduct itself will be considered a serious matter and may result in disciplinary action, including termination of employment or contract.
- Relevant Board Committees charged with overseeing the whistle blower program, and the Risk and Compliance Committee will be provided updates on whistleblowing as relevant.
- A breach of the policy may, in some circumstances, result in disciplinary action up to and including dismissal. Any report of breaches under the policy will be investigated.

**AMENDMENTS/REVIEW:**

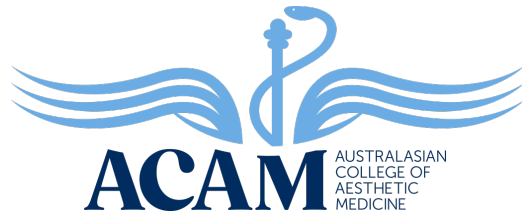
‘Review or Amended by the Management Committee (23 July 2023)’

‘Endorsed by Management Committee (31 July 2023)’

**RELATED DOCUMENTS**

The following documents are related to this policy.

1. Privacy Policy
2. User Terms and Conditions
3. Fees and Refund Policy
4. Data Management Policy
5. Exceptional Circumstances and Special Considerations Policy
6. Participation and Compliance Policy



- 7. Complaints Policy
- 8. Glossary of Terminology

**REFERENCES:**

**File:** ACAM Policy and Procedural Manual/Policy Manual Complete/Updated Policies/ACAM Whistle Blower Policy 19-250723

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