

## COMPLAINTS AND WHISTLEBLOWER POLICY

<b>Approved By:</b>	Transform Global Ltd Board	<b>Effective Date:</b>	26 March 2026
<b>Policy Owner</b>	CEO	<b>Policy Delegate:</b>	
<b>Last Review Date:</b>	26 March 2026	<b>Next Review Date:</b>	26 March 2029
<b>Version Number:</b>	1.0	<input checked="" type="checkbox"/> Internal or <input checked="" type="checkbox"/> External	

### 1. PURPOSE

This policy sets out how Transform Global Ltd receives, manages, and responds to complaints and whistleblower disclosures. It exists to ensure concerns are handled fairly, confidentially, and without retaliation.

The purpose of this policy is to:

- Provide clear pathways to raise concerns.
- Support early identification and resolution of issues.
- Protect people who raise concerns in good faith.
- Meet ACNC governance standards and Australian whistleblower requirements.
- Support a safe, accountable, and transparent organisation.

### 2. SCOPE

This policy applies to complaints and disclosures made by:

- Children and vulnerable adults engaged in Transform programs.
- Parents and caregivers.
- Staff in Australia and Cambodia.
- Volunteers, sponsors, and visitors.
- Contractors, suppliers, and partners.
- Members of the public.

This policy applies to concerns relating to:

- Child and vulnerable adult safeguarding.
- Staff or volunteer behaviour.
- Fraud, corruption, or misuse of funds.
- Breaches of policies or codes of conduct.
- Misconduct, bullying, or harassment.
- Unsafe or unethical practices.

### 3. DEFINITIONS

**Complaint:** An expression of dissatisfaction about Transform's conduct, services, decisions, or behaviour that requires a response.

**Whistleblower disclosure:** A report of suspected serious wrongdoing, misconduct, or improper affairs made by an eligible person.

**Eligible whistleblower:** A current or former staff member, program beneficiary, volunteer, contractor, supplier, officer, or associate of Transform.

**Serious wrongdoing:** Includes fraud, corruption, theft, abuse, serious misconduct, breaches of law, or actions that pose a risk to people or the organisation.

### 4. PRINCIPLES

Transform manages complaints and disclosures in line with the following principles:

- Safety first, particularly for children and vulnerable adults.
- Fairness and procedural integrity.
- Confidentiality and privacy.
- Timely and proportionate response.
- Protection from retaliation.

### 5. COMPLAINTS

#### 5.1 Who can make a complaint

Any person may make a complaint, including children and vulnerable adults.

Complaints may be made:

- Verbally or in writing.
- Directly or anonymously.
- In English or Khmer.

#### 5.2 How to make a complaint

Complaints can be made through:

- A Transform staff member.

- A manager or Country Director.
- The CEO.
- A designated complaints contact.
- Email to [complaints@transformcambodia.com](mailto:complaints@transformcambodia.com).

Child-friendly and culturally appropriate options must be available in Cambodia.

### **5.3 Handling complaints**

Transform will:

- Acknowledge receipt of the complaint.
- Assess risk and urgency.
- Take immediate action if safety is at risk.
- Investigate in a fair and impartial manner.
- Communicate outcomes where appropriate.

Safeguarding-related complaints must be managed in line with safeguarding procedures.

## **6. WHISTLEBLOWER DISCLOSURES**

### **6.1 Who can make a whistleblower disclosure**

Eligible whistleblowers may make disclosures about serious wrongdoing.

### **6.2 How to make a whistleblower disclosure**

Disclosures may be made to:

- The CEO.
- The Country Director.
- A Board Director.
- The Board Chair.

Disclosures may be made anonymously.

### **6.3 Protections for whistleblowers**

Transform will:

- Protect the identity of whistleblowers where possible.
- Take reasonable steps to reduce risk of retaliation.
- Treat disclosures confidentially.
- Support whistleblowers during the process.

Retaliation against a whistleblower is a serious breach of this policy.

## 7. INVESTIGATION AND RESPONSE

Transform will:

- Assess each complaint or disclosure promptly.
- Appoint an appropriate investigator.
- Ensure procedural fairness.
- Maintain confidentiality.
- Take corrective action where required.

Matters involving children or vulnerable adults will prioritise safety and wellbeing.

## 8. OUTCOMES AND ACTIONS

Possible outcomes include:

- No further action.
- Policy or process improvements.
- Training or supervision.
- Disciplinary action.
- Termination of employment, engagement, or visit.
- Referral to authorities where required.

## 9. RECORD KEEPING

Transform will:

- Maintain secure and confidential records.
- Document actions and decisions.
- Restrict access on a need-to-know basis.

Records will be retained in line with legal and organisational requirements.

## 10. FALSE OR MALICIOUS REPORTS

Reports made in good faith are protected, even if unsubstantiated.

Knowingly false or malicious reports may result in disciplinary action.

## 11. REVIEW AND OVERSIGHT

The Board will:

- Receive reporting on serious matters.
- Monitor trends and risks.
- Ensure this policy remains effective.

## 12. POLICY REVIEW

This policy is reviewed every three years, or earlier if required due to:

- Legislative change.
- Serious incidents.
- Organisational change.

All changes require Board approval.

Approved by the Board of Transform Global Ltd

Review cycle: Three years

END

## VERSION CONTROL

Original Version:	1.0	Version Date:	26 March 2026
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