

From: [Ben Goodwin](#)
To: [Whistleblower Policy](#)
Subject: Submission: response to proposed whistle-blower guidance
Date: Tuesday, 17 September 2019 2:55:32 PM

Hi – this has been written from my position as a compliance manager at a boutique funds management company (single open-plan office, team size of seven).

My submission relates to the provision that “a whistle-blower disclosure can only be made to ASIC, APRA, an officer or senior manager of the company, an auditor, or member of an audit team conducting an audit into the company or an actuary of the company.”

I believe this provision needs to exclude ‘senior manager of the company’ for single office, low team size (less than 10) organisations.

This is due to the inherently higher risk of an unintentional / inadvertent breach of confidentiality of the whistle-blower in small teams / office spaces (ie a small number of people sitting in close proximity to each other), posing unnecessarily higher risk for both the whistle-blower and eligible recipient.

As a registered company, it is possible for an externally located, non-employee director be the Eligible Recipient, and an outsourced partner manage any subsequent investigation.

I am happy to discuss further if you would like.

Regards,

Ben

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