

**From:** [Ian Jackson](#)  
**To:** [Whistleblower Policy](#)  
**Subject:** ASIC Consultation Paper 321 - Whistleblower Policies - Submission of World Education Australia Limited (WEAL) ABN 39 106 279 225  
**Date:** Wednesday, 11 September 2019 3:12:50 PM

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FAO: Andivina Uy, Senior Adviser, Strategic Policy  
Greg Hackett, Senior Manager, Office of the Whistleblower  
Australian Securities and Investments Commission  
Brisbane

Hello

I am making this brief submission in respect of the above consultation paper on behalf of WEAL, a company limited by guarantee, a charity registered with the Australian Charities and Not-for-profits Commission (ACNC), and involved in overseas development activities.

WEAL is an accredited member of the Australian Council for International Development (ACFID), and is also fully accredited with the Department of Foreign Affairs and Trade (DFAT), thus receiving relevant ANCP funding.

Our last re-accreditation process with DFAT was successfully undergone in 2017, covering (inter alia) a wide range of our internal processes and procedures, and our current approval by DFAT is for 5 years from May 2018.

In relation to ACFID, we are required to undergo a rigorous triennial (with interim submissions in the intervening years) process of seeking their agreement that we comply with their Code of Conduct (Code): that Code includes a requirement that we have a complying Whistleblower Policy. The Code is wide-ranging in its scope and not only covers the conduct of our charitable activities, but also matters such as the safety, treatment and welfare of our staff (approximately 50-60 employees, volunteers and contractors).

As far as concerns ACNC, we provide them with an Annual Information Statement (AIS), and are now subject to their recently enacted External Governance Standards in relation to our overseas activities (at present, 100% of all our work).

Many other Australian charities operating in the aid sector, funded by DFAT and members of ACFID, will have similar regular scrutiny applied to them.

In light of the above, we believe that there is a compelling case for suggesting that the NFP/charitable sector be exempted from ASIC's proposed whistleblower requirements, where other regulator/industry scrutiny already exists.

Please take these matters into account in your deliberations.

Yours Truly

**Ian Jackson : Compliance Adviser**

**Good Return**

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Work day: Friday

*Good Return is a registered business name of World Education Australia Ltd. ABN 39 106 279 225 & AFSL 504804*