ST JOHN, PRIORY FOR SOUTH AFRICA

Whistleblowing Policy

Speaking up safely: the Order of St John Ethics Hotline

Policy | Version 3.0 | Office of the Chief Executive Officer

St John

POLICY IN BRIEF

Anyone who sees wrongdoing at St John South Africa can report it safely, and anonymously if they choose, through the Order of St John Ethics Hotline. St John will protect them from any reprisal, look into every report, and tell them what happened.

All reports, of any nature, are routed to the Director: Human Resources as Whistleblowing Officer, and are then dealt with by the relevant department head, moving up the line where that person is involved.

Document control

Item	Detail
Organisation	St John, Priory for South Africa (Registered NPO 000-814)
Policy	Whistleblowing Policy
Version	3.0 (revision)
Policy owner	Yolandé Oosthuizen MStJ, Director: Human Resources
Approved by	Paul Stander OStJ, Chief Executive Officer
Effective date	31 March 2026
Review	Every 12 months, or sooner if the law changes
Applies to	All employees, volunteers, Brigade members, trustees, contractors, suppliers, learners, patients, customers and the public
Related policies	Conflict of Interest Policy (v2.0); Delegation of Authority; Disciplinary Code; Grievance Procedure; AI Governance and Acceptable Use Policy; Privacy (POPIA) Policy

Version history

Version	Date	Change
1.0	30 June 2022	Policy first approved
2.0	12 March 2025	Reviewed
3.0	31 March 2026	Reviewed

The Ethics Hotline at a glance

Channel	Details
Online report (24 hours, 7 days)	thornhill.co.za/ethicshotline_stjohn
Website link	stjohn.org.za/order-of-st-john-ethics-hotline, and "Ethics Hotline" in the footer of every page
Operated by	Thornhill Associates, an independent third party
Anonymous?	Yes. Giving your name and contact details is optional
Evidence	Documents can be uploaded with the report

The hotline is currently an online form only; no hotline telephone number, email address or SMS line is published on the website. See section 7.3 for the recommended additional channels.

1. Purpose, commitment and scope

1.1 Purpose

St John exists "for the faith and in the service of humanity". People trust us with their eyes, their safety and their donations, and that trust depends on honest conduct. This policy:

1. Encourages anyone to raise concerns about wrongdoing early, without fear.
2. Gives clear, safe channels for doing so, led by the Order of St John Ethics Hotline.
3. Protects people who speak up in good faith from any reprisal.
4. Sets out how St John receives, assesses, investigates and closes every report.
5. Makes sure the hotline is visible and available to everyone, in every centre.

1.2 Our commitment

The Chief Executive Officer and the Board of Trustees are committed to a culture where speaking up is normal and valued. Raising a concern is an act of loyalty to St John, not disloyalty. No one will be victimised for a report made honestly, even if it turns out to be mistaken.

1.3 Who may report

Anyone, inside or outside St John, may use this policy. This includes:

- employees (permanent, fixed term, part time and temporary), interns and learnership candidates;
- volunteers, Brigade members and cadets (with a parent or guardian's support where under 18);
- trustees, directors and committee members of the Priory;

- contractors, consultants, locums, agents and labour brokers' staff;
- suppliers, service providers and partners;
- learners on our training courses, eye care patients and their families, Stella Londt residents and their families, event clients and customers;
- donors, funders and members of the public;
- former employees and volunteers, and job applicants.

1.4 Where it applies

The policy covers every part of St John South Africa: head office (19 Woolston Road, Westcliff), all training centres, all eye care centres and outreach screening projects, the Brigade and event medical services, Schools and Youth Development, St John Stella Londt, and any activity carried out in St John's name.

2. Legal and best-practice framework

2.1 South African law

This policy complies with, and is to be read with:

Law	What it means for this policy
Protected Disclosures Act 26 of 2000, as amended by the Protected Disclosures Amendment Act 5 of 2017	Protects employees and workers (including contractors and consultants) who make a protected disclosure from occupational detriment, and makes a knowingly false disclosure an offence
Labour Relations Act 66 of 1995, section 186(2)(d)	Occupational detriment linked to a protected disclosure is an unfair labour practice
Prevention and Combating of Corrupt Activities Act 12 of 2004, section 34	Anyone in a position of authority who knows or ought reasonably to suspect corruption, theft, fraud, extortion, forgery or uttering involving R100,000 or more must report it to the police
Protection of Personal Information Act 4 of 2013	Personal information in reports is processed lawfully, kept secure and used only for this purpose
Children's Act 38 of 2005	Suspected abuse or neglect of a child must also be reported to the proper authorities, as that Act requires
Constitution of the Republic of South Africa, 1996	Freedom of expression, fair labour practices and dignity

> **PENDING LEGISLATION**
>
> The draft Protected Disclosures Bill, 2026 has been published for public comment and would repeal and replace the current Act. It is not yet law. It proposes protection beyond employees, compulsory internal reporting procedures and criminal penalties for exposing a whistleblower's identity. This policy already meets those standards, and will be reviewed when the new Act is passed.

2.2 International best practice

The policy also follows recognised global standards:

- **ISO 37002:2021** Whistleblowing management systems: the principles of trust, impartiality and protection, and the full receive, assess, address and conclude cycle.

- **EU Whistleblowing Directive (2019/1937):** acknowledgement within 7 days and feedback within 3 months, protection for a wide circle of reporters and for those who help them.
- **UK Public Interest Disclosure Act 1998:** clear routes to prescribed external bodies.
- **Australian Corporations Act 2001, Part 9.4AAA,** used by St John Ambulance Australia: anonymity, eligible recipients and an independent hotline.
- **Transparency International's International Principles for Whistleblower Legislation,** the King V Report on Corporate Governance for South Africa (effective 1 January 2026), and guidance from The Ethics Institute (South Africa).

2.3 Definitions

Term	Meaning
Whistleblower (reporter)	Any person who reports a concern under this policy
Report (disclosure)	Information about suspected wrongdoing, given through a channel in section 4
Reasonable belief	The reporter honestly believes, on the information they have, that wrongdoing has occurred, is occurring or is likely to occur. Proof is not required
Retaliation (occupational detriment)	Any harm or threat because of a report: dismissal, suspension, demotion, transfer, loss of shifts or volunteer duties, harassment, intimidation, exclusion, a bad reference or legal threats
Whistleblowing Officer	The person who receives and manages reports; see section 8
Ethics Hotline	The independent Order of St John Ethics Hotline operated by Thornhill Associates

3. What to report

3.1 Report any of the following

- **Fraud, theft and financial misconduct:** falsified invoices, claims, timesheets or records; misuse of donor or grant funds; theft of cash, stock, spectacles, first aid kits or equipment.
- **Bribery and corruption:** kickbacks, bribes, collusion with suppliers, tender or quote manipulation, or bypassing the Delegation of Authority.
- **Undeclared conflicts of interest** and favouritism or nepotism, as defined in the Conflict of Interest Policy.
- **Patient, learner and public safety:** unsafe clinical or optometric practice, unqualified people performing regulated work, falsified training results or certificates, unsafe ambulances or event medical cover.
- **Safeguarding:** abuse, neglect or exploitation of children (including at school screenings and cadet activities), older persons at Stella Londt or any vulnerable person.
- **Harassment and discrimination:** sexual harassment, bullying, racism or any unfair discrimination.
- **Health and safety and environmental breaches.**
- **Data and privacy breaches:** misuse or leaking of personal or patient information, or misuse of AI tools contrary to the AI policy.
- **Breach of law, regulation or accreditation conditions** (for example HPCSA, QCTO or Department of Employment and Labour requirements).

- **Misuse of the St John name, cross or insignia.**
- **Concealment** of any of the above, or retaliation against anyone who has reported.

3.2 What this policy is not for

Personal workplace grievances that affect only you, such as a disagreement about your pay, leave, performance rating or a decision about your own role, should go through the Grievance Procedure. Customer service complaints about a course or an eye test should go to the centre manager or the general contact line (011 646 5520). If a grievance also reveals wrongdoing that affects others, or you have suffered retaliation for reporting, this policy applies.

> **EMERGENCIES**
> If someone is in immediate danger, call **10111** (police) or **112** first, then report through this policy.

4. How to report

You may use whichever channel you trust most. You do not have to report to your manager first.

4.1 The Order of St John Ethics Hotline (preferred)

The hotline is run independently by Thornhill Associates, so no St John manager sees who you are unless you choose to say. Thornhill sends any report about the Director: Human Resources directly to the Chief Executive Officer, and never to her.

1. Go to thornhill.co.za/ethicshotline_stjohn, or click "Ethics Hotline" at the foot of any page on stjohn.org.za, or scan the QR code on the notice in your centre.
2. Choose whether to give your name or stay anonymous.
3. Select the type of concern (fraud, misconduct, unethical behaviour, theft, corruption or other).
4. Describe what happened: who, what, where, when and how, as far as you know.
5. Upload any supporting documents or photographs, if you have them.
6. Submit the report. It is available 24 hours a day, 7 days a week.

4.2 Internal channels

You may also report, in person, by phone or in writing, directly to the Whistleblowing Officer, Yolandé Oosthuizen MStJ, Director: Human Resources (yolande.oosthuizen@stjohn.org.za). All reports of any nature, including those about the Chief Executive Officer, are routed to her and then referred under section 6.2. A report about the Director: Human Resources herself goes directly to the Chief Executive Officer (paul.stander@stjohn.org.za).

- If you prefer, you may raise a concern with your manager, a department head, or (for volunteers) your Divisional Officer or the Brigade Chief Commissioner.

Anyone who receives a report must pass it to the Whistleblowing Officer within 2 working days, keep it confidential and take no other action on it.

4.3 Reporting outside St John

We encourage internal reporting first so we can act quickly. You remain free, however, to report to an appropriate external body, and you are protected when you do so in line with the Protected Disclosures Act. These include the South African Police Service and the Directorate for Priority Crime Investigation (Hawks), the Public Protector, the Auditor-General, the South African Human Rights Commission, the Commission for Gender Equality, the Information Regulator, the Health Professions Council of South Africa, the Department of Employment and Labour, and the Department of Social Development (NPO Directorate). You may also seek advice from your own legal adviser at any time.

4.4 What to include

Give as much detail as you can, but do not investigate on your own, gather evidence unlawfully or confront the people involved. A report based on a reasonable belief is enough.

5. Protection of the whistleblower

5.1 Anonymity

You may report anonymously. St John will never try to identify an anonymous reporter, by handwriting, metadata, IP address or any other means. Anyone who tries to will face disciplinary action. Anonymous reports are assessed and investigated in the same way as named reports, although it may be harder to give feedback or ask follow-up questions.

5.2 Confidentiality

If you give your name, it will be shared only with the people who strictly need it to investigate, and only with your consent, unless the law or a court requires disclosure. Reports and investigation files are stored securely with access limited to the Whistleblowing Officer and the investigation team. Personal information is processed in line with POPIA. The hotline provider's privacy notice explains that report data may be stored or processed outside South Africa; St John will confirm in its contract with the provider that adequate POPIA safeguards apply.

5.3 No retaliation

No one may victimise, threaten, disadvantage or discriminate against a person because they made a report in good faith, or because they helped with or were named as a witness in an investigation. This protection also covers family members, colleagues and volunteers associated with the reporter. Retaliation is serious misconduct and may lead to dismissal, removal from volunteer duties or termination of a contract.

If you believe you are being retaliated against, report it immediately through the hotline or directly to the Whistleblowing Officer. It will be investigated as a separate matter. Where needed, St John will take protective steps, such as changing reporting lines, adjusting rosters or offering counselling through the employee wellness programme.

5.4 Your own involvement

Making a report does not give immunity for your own wrongdoing. Where a reporter was involved, St John will take their honesty and cooperation into account.

5.5 False or malicious reports

A report made honestly that turns out to be wrong is fully protected. A report the reporter knows to be false, or makes to harm someone, is not protected and may lead to disciplinary action. Making a knowingly false disclosure is also an offence under the Protected Disclosures Act.

5.6 Fairness to the person reported

Anyone named in a report is presumed innocent. They will be told of the allegations at the appropriate time, given a fair chance to respond and treated in line with the Disciplinary Code. Their identity is also kept confidential.

6. How reports are handled

Every report is logged, assessed within 14 days and closed with a recorded outcome; the reporter hears back within 3 months.

6.1 Timelines

Step	What happens	Timeframe
Receive	Every report, of any nature and through any channel, goes to Yolandé Oosthuizen MStJ, Director: Human Resources, as Whistleblowing Officer. A report about her goes directly to the Chief Executive Officer. It is logged in the confidential register	Same day
Urgent risk	Any risk to life, a child or a vulnerable person, or of evidence being destroyed, is escalated by the Whistleblowing Officer to the person who will deal with the matter (section 6.2) for immediate protective action	Within 24 hours
Acknowledge	The reporter is told the report was received, where they can be contacted	Within 7 days
Refer and assess	The Whistleblowing Officer refers the report to the person who will deal with it under section 6.2. That person, with the Whistleblowing Officer, decides whether to investigate, refer elsewhere (for example to the Grievance Procedure or the police) or close it with reasons	Within 14 days
Investigate	An impartial investigator, internal or external, gathers facts and interviews people under the Disciplinary Code	Usually within 60 days
Feedback	The Whistleblowing Officer tells the reporter the matter is being dealt with, and in general terms what was done, without breaching others' privacy	Within 3 months
Close	Findings and actions (discipline, recovery of losses, process fixes, reporting to authorities) are recorded by the Whistleblowing Officer and the file closed	On completion

6.2 Independence and routing

All reports route first to the Whistleblowing Officer, including reports about the Chief Executive Officer. The one exception is a report about the Whistleblowing Officer herself, which goes directly to the Chief Executive Officer. The Whistleblowing Officer then refers each report to the person who will deal with it, according to what it is about and who is involved. No one may deal with a matter in which they are implicated or have a conflict of interest, so the report moves up the line:

If the report concerns	It is dealt with by
Any matter in a department (finance, training, eye care, Brigade, Stella Londt, operations and so on)	The head of the relevant department
A matter in which the department head is involved	That department head's next-in-line manager
A member of the Executive Committee (EXCO)	The Chief Executive Officer
The Director: Human Resources (Whistleblowing Officer)	Goes directly to the Chief Executive Officer, who deals with it
The Chief Executive Officer	Stuart Waetzel GCStJ, Chancellor and Chairman of the Board of Trustees (stuart.waetzel@stjohn.org.za)

Complex, high-value or senior matters may be given to an independent forensic investigator or attorney, appointed by the Chief Executive Officer, or by the Chancellor where the Chief Executive Officer is implicated.

6.3 Reporting to authorities

Where a report reveals a crime covered by section 34 of PRECCA, abuse of a child or vulnerable person, or a matter that must be reported to a regulator or funder, St John will report it as the law or the funding agreement requires.

7. Making the hotline available to everyone

A hotline only works if people know it exists. The policy and the hotline must be visible to every employee, volunteer, learner, patient, resident, customer and supplier.

7.1 Intranet and online

- This policy is published on the St John intranet within 14 days of approval, on a dedicated "Speak Up: Ethics Hotline" page linked from the intranet home page.
- The page holds the policy, the hotline link and QR code, a short guide to making a report and a list of frequently asked questions.
- The hotline stays linked in the footer of every page of stjohn.org.za, and the policy is published on the public website.
- All staff email signatures carry a one-line "Report wrongdoing confidentially:" link to the hotline page.

7.2 Every centre and site

An A4 or A3 Ethics Hotline notice (Annexure A), with the QR code, must be displayed permanently at:

- head office reception and staff areas;
- every training centre, in reception and in each training room;
- every eye care centre, in the patient waiting area and the staff room;
- St John Stella Londt, on the residents' and staff notice boards;
- every Brigade division hall and meeting venue, and on the event medical post kit;
- inside each St John vehicle used for events or outreach, where practical.

A printed copy of this policy is kept in a file at every centre for anyone without internet access. Centre managers check the notices at the start of each quarter and replace any that are missing or damaged.

7.3 Strengthening the hotline channels

Best practice is to offer several ways to report, including for people without data or internet. The hotline currently offers an online form only. St John will ask Thornhill Associates to add:

1. a toll-free telephone line, ideally in all official South African languages;
2. a confidential email address and a WhatsApp or SMS channel;
3. "Volunteer or Brigade member", "Learner", "Patient" and "Resident" as reporter types on the form (it currently lists contractor, customer, employee, supplier and other);
4. a secure reference number so anonymous reporters can receive feedback and answer questions.

Until these are in place, the internal channels in section 4.2 remain available by phone and in person.

7.4 Communication and training

Audience	How they are told	When
New employees	Policy in the induction pack; acknowledgement signed with the employment contract	On joining
New volunteers	Hotline clause in the Brigade volunteer agreement and membership form	On joining
All employees and volunteers	Short awareness session or e-learning module	Every year
Managers and centre managers	Training on receiving a report, confidentiality and avoiding retaliation	Every year
Learners, patients, residents and customers	Centre notices; hotline link on the website, course joining instructions and booking confirmations	Ongoing
Suppliers and contractors	Hotline clause in contracts, purchase orders and the supplier onboarding form	On contracting
Trustees	Policy in the Board induction pack and annual review	Every year

8. Roles, records, monitoring and approval

8.1 Roles and responsibilities

Role	Responsibilities
Board of Trustees	Oversee the policy and its effectiveness; review quarterly statistics and outcomes
Chief Executive Officer	Approves the policy; leads a speak-up culture; deals with reports about EXCO members; makes sure resources and action follow findings
Whistleblowing Officer (Director: Human Resources)	Owns the policy; receives every report of any nature; manages the register; refers each report under section 6.2; protects reporters; gives feedback; reports to the Chief Executive Officer
Chief Operating Officer	Hosts the intranet page and secures report records and IT systems
EXCO members and centre managers	Display notices; pass on reports within 2 working days; stop any retaliation in their area
Brigade Chief Commissioner and Divisional Officers	Make sure every volunteer knows the hotline and is protected
Everyone	Report wrongdoing honestly; cooperate with investigations; keep matters confidential; never retaliate

8.2 Records

The Whistleblowing Officer keeps a confidential register of all reports: reference, date, type, centre or unit, steps taken, outcome and dates. Investigation files are kept securely for 7 years after closure, in line with South African record-keeping requirements, then destroyed securely, unless legal proceedings require longer.

8.3 Reporting and monitoring

Each quarter the Whistleblowing Officer gives the Chief Executive Officer an anonymised report: number and type of reports, by unit; time taken at each step; outcomes and actions; any retaliation complaints; and the status of notices and training. The Board of Trustees receives an annual summary, and the headline figures are included in the Integrated Annual Report. The Chief Executive Officer reviews whether the hotline is trusted and used, for example by tracking low or zero reporting in any unit.

8.4 Breach of this policy

Breach of this policy, including retaliation, breach of confidentiality, attempts to identify an anonymous reporter, or failure to pass on a report, may lead to disciplinary action, removal from volunteer office, or termination of a contract.

8.5 Review

The policy owner reviews this policy every 12 months, and immediately when the Protected Disclosures Bill, 2026 becomes law.

Annexure A: Ethics Hotline notice for all centres

Wording for the A4 or A3 notice displayed at every site, to be printed in St John branding with the QR code below.

SEE SOMETHING WRONG? SPEAK UP.

Order of St John Ethics Hotline

Fraud, theft, bribery, abuse, harassment, unsafe practice or any other wrongdoing at St John: report it safely and confidentially.

- You can stay completely anonymous.
- The hotline is run independently by Thornhill Associates.
- Available 24 hours a day, 7 days a week.
- No one may victimise you for reporting honestly.

Scan the QR code or visit:
thornhill.co.za/ethicshotline_stjohn

Also on stjohn.org.za under "Ethics Hotline".

If someone is in immediate danger, call 10111 or 112 first.

St John, Priory for South Africa | Registered NPO 000-814

Scan to report