

Whistleblower Policy

Contents

1. Policy Objective.....	1
2. Governing Legislation.....	1
3. Scope	1
4. Policy.....	1
5. Definitions.....	4
6. Supporting and Related Documents	4
7. Version Control Information.....	5

1. Policy Objective

Anglicare Victoria (AV) encourages individuals to report wrongdoing. We are committed to creating an environment in which individuals feel safe and comfortable reporting wrongdoing with confidence they will be protected.

By implementing this policy, AV commits to:

- protect and support the dignity, wellbeing, career and reputation of individuals who report behaviour they reasonably believe to be wrongdoing; acting in good faith and in line with the AV Code of Conduct Policy and guideline principles;
- deal with disclosures of wrongdoing thoroughly and impartially;
- conduct investigations into reported wrongdoing when appropriate thoroughly and impartially; and
- take appropriate action to rectify any wrongdoing which is discovered

2. Governing Legislation

- Corporations Act 2001 (Cth)
- Taxation Administration Act 1953 (Cth)

3. Scope

This policy applies to all; Council, Board and Board Committee members, employees, contractors, consultants, secondees, students and volunteers working for AV.

4. Policy

4.1 What is 'wrongdoing'?

We encourage individuals to report any behaviour they feel is inappropriate or unethical, and recognise our responsibility to support those who report wrongdoing.

The following list outlines examples of wrongdoing. If you are unsure if behaviour constitutes wrongdoing we encourage you to speak to one of the following; Quality & Review Director, Finance & Business Services Director, People & Culture Director:

- illegal activity, in breach of public laws;
- a serious breach of AV policies and procedures;

- conducting business in an unsafe manner, likely to cause harm to the individual themselves, others or AV as an organisation;
- unethical behaviour including; unfairness, bias, fraudulent activity, concealing of wrongdoing and/or serious impropriety or corrupt conduct;
- improper behaviour relating to accounting, internal accounting controls, actuarial or audit matters;
- an activity posing a substantial risk to the environment;
- a substantial mismanagement of AV resources; and
- conduct that is detrimental to AVs financial position or reputation

This policy does not cover:

- personal work-related grievances (including interpersonal conflict between employees, suspension or termination of engagement or terms and conditions of engagement), which are managed under our Grievance Resolutions Policy & Performance Management Policy;
- disciplinary matters (performance management, investigations in relation to incidents like Client Incident Management System (CIMS)) which are managed in line with the relevant procedures;
- Complaints in respect to client care which are covered by our Feedback and Complaints Policy, aligned to the Department Health & Human Services standards. If you are unsure if the matter is the covered by the Feedback and Complaints Policy or the Whistleblower Policy please clarify with the Director Quality & Outcomes.
- matters covered by Fair Work legislation

If you feel your matter has not been managed appropriately in the situations above you can either use the appeals process or raise the issue directly with; Director Quality & Outcomes, or Director Finance & Business Services or Director People & Culture.

4.2 Types of wrongdoing including Roles and Responsibilities

We monitor a broad-range of issues through effective procedures, audits and practices to support the detection of wrongdoing. The following Executive have responsibility for monitoring, actively managing and investigating reports of wrongdoing:

<i>Wrongdoing</i>	<i>Executive/s responsible for monitoring and active management (subject to Note 1)</i>
Illegal activity, in breach of public laws;	Client Services, People & Culture, Finance, Quality & Outcomes
Serious breach of AV policies and procedures;	People & Culture and Director responsible for policy and procedure implementation
Unethical behaviours including; unfairness, bias, fraudulent activity, concealment of wrongdoing and serious impropriety;	Finance, People & Culture

Wrongdoing	Executive/s responsible for monitoring and active management (subject to Note 1)
Improper behaviours relating to accounting, internal accounting controls, actuarial or audit matters or inappropriate letting of contracts;	Finance, Quality & Outcomes
Activity that poses a substantial risk to the environment;	Infrastructure, Business Technology, Property, Fleet
Unsafe conduct likely to cause harm to the individual themselves, others or AV as an organisation	People & Culture, Client Services
Substantial mismanagement of AV resources;	Finance
Conduct that is detrimental to AV financial position or reputation;	Finance

Note 1 – If the wrongdoing directly relates to one of the nominated responsible executives, that executive will not be involved in monitoring and managing the incident. In that instance, the Chief Executive Officer (CEO) will determine an alternative executive to be responsible. If the CEO is on leave, or the wrongdoing relates to the CEO, it will be monitored and managed directly between the Deputy Chief Executive Officer and the Board Chair.

Where appropriate, AV Internal Audit will be engaged to audit controls and support investigations of wrongdoing, in keeping with AV's risk management framework.

4.3 Reporting wrongdoing

AV is engaging an independent, external whistleblower service. The details of this confidential service will be communicated when the reporting channel has been introduced.

You can report a wrongdoing to a member of the Executive Group. If you are comfortable doing so, you are also welcome to report the matter directly to the CEO.

4.4 Legal protections for disclosers

You can access legal rights and protections for whistleblowers if you meet the definition of an 'eligible whistleblower' in the Corporations Act. The criteria seeks to include most people with a connection to an organisation who may be in a position to observe or be affected by wrongdoing and may face repercussions for reporting it. The protections extend to the spouses and relatives of these people.

Protections for eligible whistleblowers include:

- identity protection (confidentiality);
- protection from detrimental acts or omissions;
- compensation and other remedies; and
- civil, criminal and administrative liability protection

This policy does not prevent an individual from reporting wrongdoing to a State or Commonwealth regulator or Law Enforcement Agency in accordance with applicable laws or standards.

4.5 Investigating alleged wrongdoing

Investigations of alleged wrongdoing will be conducted in a confidential, fair and objective manner. The investigation process will vary depending on the nature of the alleged wrongdoing and the amount of information provided. For a report to be investigated it must contain sufficient information to form a reasonable basis for investigation.

When an individual reports anonymously they are encouraged to provide as much information as possible to enable a full investigation.

In all circumstances, AV will conduct an investigation in accordance with the principles of fairness and natural justice. In certain circumstances, AV may elect to appoint an independent third party to conduct the investigation.

When the report of wrongdoing was not made anonymously, and it is appropriate to do so, the individual/s who reported the wrongdoing will be informed of the outcome of the investigation. In cases where the investigator has not substantiated the allegations, an appropriate explanation will be given to the individual, subject to any privacy and confidentiality considerations.

4.6 Annual reporting of wrongdoing incidents

Management will provide an annual report to the Risk Advisory Group of the Board in March each year, for the preceding calendar year, with the annual report provided to the Board the following month. Additionally, the Chief Executive Officer will brief the Board Chair on all whistleblower allegations that relate to any member of the executive.

This is to assure good risk management and corporate governance within AV and provide an opportunity to monitor the effectiveness of our policy and procedures. This annual report will maintain full confidentiality.

5. Definitions

Whistleblower - a person who informs on a person or organisation regarded as engaging in an unlawful or unethical activity.

Wrongdoing – illegal or dishonest behaviour (see section '**4.1 What is 'wrongdoing'?**')

Protected – The Corporations Act contains protections for whistleblowers who meet the criteria, including; protection of information, protection against legal action and protection against detriment.

6. Supporting and Related Documents

- Feedback & Complaints Policy
- Code of Conduct Policy
- Professional ethical standards (as applicable)

7. Version Control Information

Version issue date:	7 August 2020
Policy owner:	Director People & Culture
Implementation:	People & Culture, Finance & Business Services, Quality & Review
Approval authority:	Anglicare Victoria Board
Original approval date:	1 June 2016
Review date:	August 2022