



## WHISTLEBLOWER POLICY AND PROCEDURE

<b>Responsible Officer</b>	<b>Administration Officer</b>
<b>Approved by</b>	<b>Senior Management Team</b>
<b>Review by</b>	<b>Joanne Cornelius</b>
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### PURPOSE

The Board and Senior Management must adequately manage risk and cultural issues within Community Veracity. This policy promotes a culture of compliance, honesty and ethical behavior within Community Veracity. Community Veracity's aim is to encourage staff to report any Wrongdoing in good faith and in an environment free from victimisation.

### SCOPE

This policy applies to all Staff members (including Directors), contractors, consultants, secondees and volunteers working for or with Community Veracity.

This policy sets out the minimum requirements for the Community Veracity.

### POLICY

#### ***Commitment***

Community Veracity's Directors and Management encourage all staff to report Wrongdoing. All staff should feel confident and comfortable about reporting Wrongdoing.

Community Veracity's Directors and Management are committed to protecting and supporting the dignity, wellbeing, career and reputation of anyone reporting Wrongdoing.

#### ***What is "Wrongdoing"?***

Examples of Wrongdoing include, but are not limited to, the following:

- a breach of regulations or laws;
- a breach of Community Veracity's Policies and Codes;
- dishonest or corrupt behavior, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits;
- fraudulent activity;
- illegal activity (including theft, drug sale / use, violence or threatened violence and property damage);
- impeding internal or external audit processes;
- improper behavior relating to accounting, internal accounting controls, actuarial, or audit matters;
- an activity that poses a substantial risk to the environment;
- a serious impropriety;
- conduct endangering health or safety;
- a substantial mismanagement of Community Veracity's resources;



- conduct that is detrimental to Community Veracity’s financial position or reputation; and
- concealment of Wrongdoing.

### ***What is “Wrongdoing”?***

A staff member can report Wrongdoing in one of two ways – to his or her direct manager, or anonymously.

#### **1. Management**

Depending on the nature of the Wrongdoing, the staff member is encouraged to first discuss their concern with their direct manager.

Any staff member that submits or receives a report must treat the matter confidentially.

If the staff member does not feel comfortable speaking with their manager, they can raise a Wrongdoing with the [Chief Financial Officer / Chief Executive Officer / Human Resources Manager].

Reports of Wrongdoing may be investigated using the Community Veracity’s [Staff Grievance Policy and Procedures or Injury and Incident Reporting Policy and Procedures].

Staff who report Wrongdoing will be protected. Community Veracity will conduct an investigation into the alleged Wrongdoing in accordance with the principles of fairness and natural justice.

This policy does not prevent a staff member from reporting Wrongdoing to a state or commonwealth regulator in accordance with applicable laws or standards.

#### **2. Anonymously**

Community Veracity also recognises that staff may prefer to bypass their direct line of management in certain circumstances where, for example, they:

- believe they may be victimised if they use the normal reporting method; or
- prefer to make the report anonymously.

To ensure these staff can report Wrongdoing in such circumstances, Community Veracity encourages staff to report Wrongdoing on an anonymous basis to the [Chief Financial Officer / Chief Executive Officer / Human Resources Manager] by written communication.

### ***Investigating alleged Wrongdoing***

Investigations of alleged Wrongdoing will be conducted in a manner that is confidential, fair and objective. The investigation processes 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.

A staff member reporting anonymously should provide as much information as possible so as not to compromise the ability to fully investigate the report.

Where the report of Wrongdoing was not made anonymously, a Whistleblower will be informed of the outcome of the investigation. In cases where the Investigator has not substantiated the allegations, an appropriate explanation will be made to the Whistleblower, subject to any privacy and confidentiality rights.