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| Policy Reference: | 14 | Date adopted: | August 2023 |
| Prepared By: | Risk and Compliance Officer | | |
| Version: | 2 | | |
| Approved By: | Board | | |
| Date of current review: | June 2023 | Date for next review: | July 2026 |

1. Purpose

The Whistle-blower protection policy is one of several policies and codes that promotes a culture of compliance, honesty, and ethical behaviour within Centacare SW NSW.

An effective whistle-blower program can result in:

- More effective compliance with relevant laws.
- More efficient fiscal management of Centacare through, for example, the reporting of waste and improper tendering practices.
- A healthier and safe workplace environment through the reporting and action of unsafe practices.
- More efficient management.
- Improve morale within the organisation; and
- An enhanced perception and the reality that Centacare is taking its governance obligations very seriously.

2. Policy Statement

Centacare is committed to encouraging staff to report any wrongdoing in good faith and in an environment, free from victimisation so that the Board and Senior Management can adequately manage risk and cultural issues within Centacare.

Further, Centacare has a commitment to applicable laws and practices including the AS 8004-2003 “Whistle-blower *protection for programs and services*”.

3. What is ‘reportable conduct’?

Examples of “reportable conduct” include, but are not limited to the following:

- a) Dishonest or corrupt behaviour, including soliciting, accepting, or offering a bribe, facilitation payments or other such benefits.
- b) Fraudulent activity.
- c) Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property).
- d) A breach of Commonwealth or State legislation or local authority By-laws (e.g., Trade Practices Act or Income Tax Assessment Act).
- e) Unethical behaviour including a breach of Centacare’s Policies and Codes.
- f) Other serious misconduct.
- g) Conduct endangering health or safety.

- h) Improper behaviour relating to accounting, internal accounting controls, actuarial, or audit matters.
- i) Gross mismanagement.
- j) Serious and substantial waste; or
- k) Repeated instances of breach of administrative procedures.

4. Scope

This policy applies to:

- Centacare South West NSW Ltd (Centacare) and its Board; and
- All employees, volunteers, contractors, work experience students and trainees carrying out work for Centacare.
- All participants of Centacare e.g., parents, caregivers, and children.
- All records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive and personal nature.

5. Definitions

| Term | Definition |
|-----------------------|---|
| Whistle-blower | A person being a CEO, manager, employee, or contractor of the Centacare SW NSW who whether anonymously or not, makes, attempts to make, or wishes to make, a report in connections with “reportable” conduct and where the whistle-blower wishes to avail themselves of protection against reprisal for having made a report. The whistle-blower may or may not wish to remain anonymous. |

6. Responsibility

| Responsibility | Role |
|--|-----------------------------|
| Policy Owner | Centacare SW NSW Board |
| Compliance, Monitoring and Review | Chief Executive Officer |
| Reporting | Chief Executive Officer |
| Records Management | Risk and Compliance Officer |

7. Regulatory Compliance

- Corporations Act 2001 (Cth)
- Enhanced Whistle-blower Protection Act 2019

8. Other Compliance, Certification, Accreditation

- Australia Standard. AS8004-2003. Whistle-blower Protection Programs for Entities. Corporate Governance Set. Council of Standards. Australia.
- National Standards for Mental Health Services 2010

- QIC Health and Community Service Standards
- NDIS Practice Standards and Quality Indicators – November 2021
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- NDIS Reportable Incidents

9. Related Documents

| Document | Detail |
|-----------------------------------|---|
| Policy & Procedures | Governance Charter Policy |
| Policy & Procedures | Clinical Governance Policy |
| Policy & Procedures | Financial Management Policy |
| Policy & Procedures | Human Resources Policy |
| Policy & Procedures | Privacy Policy |
| Policy & Procedures | Feedback, Complaints, Grievances Policy |
| Policy & Procedures | Professionalism Policy |
| Policy & Procedures | Diversity and Inclusion Policy |
| Policy & Procedures | Participant Welfare Policy |
| Policy & Procedures | Service Provision |
| Policy & Procedures | Asset Management |
| Policy & Procedures | Abuse, Neglect, Exploitation, and Discrimination Policy |
| Policy & Procedures | Risk Management |
| Policy & Procedures | Risk Management – Emergency & Disaster Management |
| Policy & Procedures | Whistle Blower Protection Policy |
| Policy & Procedures | Fraud Policy |
| Policy & Procedures | Carers Policy |
| Policy & Procedures | Information Management Policy |
| Policy & Procedures | Code of Conduct Policy |
| Policy & Procedures | Child Safe Policy |
| Policy & Procedures | Quality Management Policy |
| Organisational Plans & Procedures | Centacare’s Strategic Plan |
| Registers | Enterprise Risk Register |
| Registers | Delegations Register |

10. Policy Review

10.1 Approval and Review

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| Policy Reference: | 14 | Date adopted: | August 2023 |
| Approved By: | Board | | |
| Date of current review: | April 2020 | Date for next review: | April 2023 |

10.2 Amendment History

| Review Date | Approved Date | Details of Amendment |
|-------------|---------------|---|
| April 2020 | May 2020 | New Policy |
| June 2023 | August 2023 | Minor amendments – update to current legislation, quality standards, and Centacare’s Policies and Procedures. |