

Protected Disclosure Policy (Whistleblower Policy)

Introduction

Comm Unity Plus Services Ltd (commUnity+) is committed to ensuring the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. This policy provides procedures to ensure people can report instances of suspected unethical, illegal, fraudulent or undesirable conduct by commUnity+, its directors, employees, volunteers or consultants & contractors, and to ensure that anyone who does report such behaviour can do so without fear of reprisal, discrimination, intimidation or victimisation.

Authorisation and Responsibilities

The Board to authorise this policy.

CEO to approve and implement operational procedures.

1. Scope and Application

This policy applies to all Directors, employees, volunteers, consultants, and contractors.

2. Definitions

Whistleblower	A person making a disclosure under this Protected Disclosure policy. This includes those defined as an eligible whistle-blower for the purposes of Corporations Law, Tax Act or any other legislation.
Improper Conduct	Behaviours that are unethical, illegal, fraudulent or undesirable including: <ul style="list-style-type: none"> • Behaviours that constitute forms of abuse or neglect • Conduct or actions that constitute a criminal offence • Mismanagement of commUnity+'s resources • Conduct involving substantial risk to health or safety, or • Conduct involving substantial risk to the environment
Protected Disclosure Officer	General Manager Shared Services
Reasonable grounds	An objective test and relates to whether a reasonable person in possession of the information would form the belief that the Improper Conduct occurred

3. Policy

commUnity+ commits to, under this policy, to enabling the reporting of improper conduct within the organisation without reporters being subject to victimisation, harassment or discriminatory treatment.

The commUnity+ Board will appoint a Protected Disclosure Officer who will be responsible for managing reports and response actions.

commUnity+ will take all reasonable steps to protect and respect the rights of a person who reports alleged improper conduct in good faith.

commUnity+ will not tolerate any threats of retaliatory action against any person who has made or who is believed to have made a report of Improper Conduct in good faith.

Any such retaliatory action or victimisation in reprisal for a report being made under this policy will be treated as serious misconduct and will result in disciplinary action, which may include dismissal.

A Whistleblower may elect to make a disclosure anonymously. As far as possible, commUnity+ will respect the Whistleblower's request to not identify them. However, commUnity+ may not be able to investigate certain disclosures without the identity of the Whistleblower becoming known.

Where criminal matters are involved, or mandatory reporting is necessary, commUnity+ may be required to report certain allegations to the police (or other relevant agency) and provide the identity of the Whistleblower.

If the identity of the Whistleblower does become known, commUnity+ will continue to ensure that all reasonable steps are taken to protect the Whistleblower from reprisal.

commUnity+ members who breach confidentiality in relation to a known or suspected disclosure will be subjected to disciplinary proceedings, which may include summary dismissal.

Related Legislation and Documents

Legislation:	Privacy Act 1988 Occupational Health and Safety Act 2004 Corporations Act 2001
Organisational Documents:	Code of Ethics and Conduct Policy Grievance and Dispute Resolution Policy Occupational Health and Safety Policy Child Safety Policy Protected Disclosure Procedure