

# WHISTLEBLOWER



## POLICY

### 1. Purpose

At Royal Far West (RFW) we are guided by our company values of Respect, Integrity, Care and Energy. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, supplies, shareholders, and other stakeholders. RFW is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

RFW encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving RFW's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal. This policy will be made available on the RFW website and in any other ways that will ensure that it is made available to persons to whom this policy applies.

### 2. Scope of Practice

This policy applies to any person who is, or has been, any of the following with respect to RFW:

Employee	Director	Officer	Contractor (including sub-contractors and employees of contractors)	Supplier (including employee of suppliers)	Consultant	Auditor	Associate	Relative, dependant, spouse, or dependant of spouse of any of the previous
✓	✓	✓	✓	✓	✓	✓	✓	✓

### 3. Definitions

<i>Term</i>	<i>Meaning</i>
Act	Means Corporations Act 2001 (Commonwealth)
Complaint	At RFW, a complaint is an expression of dissatisfaction with the service offered or provided, or a concern that requires feedback regarding any aspect of RFW services. A <a href="#">Complaints Policy</a> exists for managing these types of issues and is available to clients, families and others who interact with or receive RFW services.
Employee	At RFW, this refers to a person whether full time, part time, temporary or casual, paid, or unpaid. It includes branch members, volunteers, contractors, consultants, students, and any other person who is authorised to represent RFW, including board members.
Grievance	At RFW, there is a separate <a href="#">Grievance Handling Policy</a> which is managed by Human Resources. A workplace grievance is a written or oral statement made by an employee regarding a concern arising in the workplace including, but not limited to, those involving:

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	<ul style="list-style-type: none"><li>▪ a workplace interpersonal conflict</li><li>▪ the way work is allocated or managed</li><li>▪ interpretation and application of organisational policies</li><li>▪ a perceived unfairness in the workplace</li><li>▪ Discrimination or harassment; or</li><li>▪ Work Health and Safety issues.</li></ul>
Whistleblower	Means a person who makes a disclosure under this Policy. They may also be referred to as a Discloser within this Policy.
Whistleblower Officer/Eligible Recipient	RFW has identified 4 staff members plus a Board member who will be the whistleblower officers (or eligible recipients) of whistleblower disclosures. May also be referred to as whistleblower recipient, whistleblower officer or disclosure recipient.
Whistleblower Protection Officer	Means the person appointed by RFW to support and protect the Whistleblower, if necessary, from detrimental action. At RFW this is the Legal, Risk and Compliance Manager.

## 4. Policy

### 4.1 Reportable Conduct

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with RFW has engaged in conduct ('Reportable Conduct') which is:

- Dishonest, fraudulent, or corrupt
- Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property)
- Unethical including any breach of the RFW policies such as the Code of Conduct
- Oppressive or grossly negligent
- Potentially damaging to RFW, its employees or a third party
- Misconduct or an improper state of affairs
- A danger, or represents a danger to the public or financial system
- Harassment, discrimination, victimisation or bullying.

For the avoidance of doubt, 'Reportable Conduct' does not include personal work-related grievances. These grievances should be reported to your manager in accordance with the [Grievance Handling Policy](#). A personal work-related grievance is a grievance about any matter in relation to a staff member's current or former employment, having implications (or tending to have implications) for that person personally and that do not have broader implications for RFW.

Examples of personal work-related grievances are as follows:

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- An interpersonal conflict between the staff member and another employee.
- A decision relating to the engagement, transfer, or promotion of the staff member.
- A decision relating to the terms and conditions of engagement of the staff member.
- A decision to suspend or terminate the engagement of the staff member, or otherwise to discipline the staff member.

### 4.2 Making a Disclosure

RFW relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.

There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

#### 4.2.1 Internal Reporting

You may disclose any Reportable Conduct to the RFW Whistleblower Officers (aka eligible recipients) listed below:

- Human Resources Manager
- Executive Manager, Transformation and Systems Integration
- Executive Director, Finance & Corporate Services
- Chief Executive Officer
- Board Member

If you are unable to use any of the above reporting channels, a disclosure can be made to an alternative “eligible recipient” within RFW. Alternative eligible recipients include:

- Officers.
- Directors.
- Senior Managers.

The Whistleblower Protection Officer (Legal, Risk and Compliance Manager) will safeguard your interests and will ensure the integrity of the reporting mechanism.

#### 4.2.2 External Reporting

Where you do not feel comfortable making an internal report, or where you have made an internal report, but no action has been taken within a reasonable time, you may disclose any Reportable Conduct to one of the following:

- RFWs independent whistleblower service, **Your Call** using the following methods:

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- Your Call Hotline number: **1300 790 228**; 9am and 12am, recognised business days, AEST
- Visiting online **Website Link** <https://www.yourcall.com.au/report>; 24/7; enter Royal Far West's unique identifier code RFW1924.

Telephone calls will be received by Your Call during business hours of between 9.00am and 12.00am. Your telephone call will not be recorded and the person taking the call is not associated with RFW in any way. They are trained specialists dedicated to dealing with whistleblowers and their concerns.

Your Call will prepare a report which details the concerns raised by you to a Whistleblower Eligible Recipient. Any information contained in the report will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to RFW.

- Alternative eligible recipients externally
  - RFW Auditors- Stewart Brown Auditors
  - ASIC – Australian Securities and Investment Commission
  - APRA – Australian Prudential Regulation Authority
  - RFW Legal Practitioner

### 5. Risk of Policy Non-compliance

<i>Risk</i>	<i>Consequence</i>
Breach of Legislation	Financial Implications (up to \$126K) and reputational damage.
Failure to protect Whistleblowers	Financial implications and reputational damage
Unethical behavior	Failure to provide method for reporting fraud or other misconduct.

Metadata	
Directorate/ Division	Corporate Services Division
Department	Corporate Governance
Author ( <i>Position</i> )	Corporate Governance Manager
Contact Details	aliciad@royalfarwest.org.au
Reviewers	Human Resources Manager Legal, Risk & Compliance Manager Corporate Services Director Executive Leadership Team Audit, Risk and Compliance Committee Corporate Services Director
Endorsed by:	ELT

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Date of Authorisation	28 September 2020
Date of Publication	28 September 2020
Date of Next Review	28 September 2022
Related Policies	<a href="#">Complaints Policy</a> <a href="#">Grievance Handling Policy</a>
References	<ul style="list-style-type: none"><li>• Treasury Laws Amendment (Enhancing Whistleblower Protections) Act_2019, which amends the <u>Corporations Act 2001</u> (Cth) <a href="https://www.legislation.gov.au/Details/C2019A00049">https://www.legislation.gov.au/Details/C2019A00049</a></li><li>• ASIC:<a href="https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/">https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/</a></li><li>• ACNC Whistleblower factsheet: <a href="https://www.acnc.gov.au/tools/factsheets/whistleblower-protections">https://www.acnc.gov.au/tools/factsheets/whistleblower-protections</a></li><li>• Whistleblowing at Your Not-For-Profit- A leaders Guide <a href="https://www.ourcommunity.com.au/search/?q=whistleblower">https://www.ourcommunity.com.au/search/?q=whistleblower</a></li></ul>
Accreditation Standards	ACHS: Standard 1 Clinical Governance; Risk Management
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