



Whistleblower Policy

Overview

At Adelaide Workers' Homes (AWH), accountability and integrity are some of our core values and we encourage people to report any genuine concerns about misconduct within the Organisation. We expect behaviour to align with our Code of Conduct and will not tolerate corrupt or illegal behaviour or other misconduct. This policy is an important tool for helping us identify and respond to misconduct. It explains how people can report concerns, how we will manage reports, how we will protect people who make reports, and how we will meet our legal duties. This policy does not prevent you from doing anything that is permitted or required by law and is not intended to change any protections that are available to you at law.

Scope

This policy applies to AWH, including Trustees and Executive members. While we encourage people to report concerns, not all concerns are covered by this policy. The following types of concerns are generally not covered under this policy:

Tenant complaints

If you are a tenant, you can appeal a decision, make a complaint or provide feedback to us by email, letter, or telephone.

Purpose

The purpose of this policy is to:

- Encourage people to report misconduct.
- Help us to identify and deter misconduct.
- Make sure that people who report misconduct can do so safely, knowing that they will be protected and supported.
- Make sure that reports are dealt with appropriately and on a timely basis.
- Provide transparency about how we receive, handle, and investigate reports.
- Support our values, vital behaviours, and Code of Conduct.
- Protect the AWH brand, and reputation.
- Meet our legal and regulatory obligations and make sure that our approach aligns with relevant standards.

AWH requires its Trustees and Executive to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of AWH we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility & Eligibility

This Whistleblower Policy is intended to encourage and enable the Trustees and Executive to raise serious concerns internally so that AWH can address and correct inappropriate conduct and actions.

You are an eligible whistleblower if you are currently, or were previously:

- A Trustee of AWH
- An Executive member of AWH
- A person who supplies goods or services to AWH (whether paid or unpaid) (e.g. contractors, consultants, service providers and business partners)
- An employee of a person that supplies goods or services to AWH (whether paid or unpaid) (e.g. employees of contractors, consultants, service providers and business partners)
- a relative or a dependant of any of the above people, or a dependant of their spouse (e.g. a relative, dependant or a spouse of a current and former employee, director, contractor, consultant, service provider, supplier and business partner)

No Retaliation

It is contrary to the values of AWH for anyone to retaliate against any Trustee or Executive member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of AWH

Who are eligible recipients?

Eligible recipients include:

- our Whistleblower Protection Officer (WPO):
- The CEO
- Other eligible recipients such as our auditors, the Australian Charities and Not For Profits Commission (ACNC), a legal practitioner (see below note), or any other person authorised by law.

Note: If you make a report to a legal practitioner to get legal advice or representation, you are protected for releasing the information to them even if they determine that the report is not about misconduct related to AWH.

In certain circumstances, a 'public interest disclosure' or 'emergency disclosure' may also be made to a journalist or member of parliament (see below for more information). However, the report must meet specific criteria for the person making the report to receive the legal protections outlined in this policy. For this reason, we encourage you to get independent legal advice before making a 'public interest disclosure' or 'emergency disclosure'.

Accounting and Auditing Matters

The CEO of AWH shall immediately notify the Audit & Risk Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant.

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The WPO will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. You can make a Protected Report by contacting a WPO directly. Our WPO is:

- James Hooper Chief Executive Officer

If you choose to report directly to the WPO, do not report concerns to someone who you suspect may be involved in the conduct or anyone that may have a conflict of interest.

If your report involves the CEO, you can make a Protected Report to the Chair of the Board.

When contacting the WPO, we recommend you tell the WPO that you wish to make a report under this Policy, so that they can make appropriate arrangements in relation to confidentiality.

Policy information

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| Approval required | Board |