

# **Whistleblower Policy**

## **1. Policy Statement**

Uniting (Victoria and Tasmania) Limited (Uniting) is the community services organisation of the Uniting Church that's worked alongside local communities across Victoria and Tasmania for over 100 years. The Uniting values; 'imaginative', 'bold', 'respectful', and 'compassionate' underpin our work and shape the nature of our relationships with consumers and other stakeholders.

Uniting is committed to operating in accordance with relevant legislation and regulation, in accordance with internal policies and procedures, and ethically (aligned with the tradition of the Uniting Church in Australia). This Whistleblower Policy recognises that a whistleblower protection program is linked to Uniting's risk management framework, particularly in identifying, dealing with and preventing wrongful conduct.

This policy has been established to:

- encourage the reporting of potential wrongdoing alongside other established internal reporting mechanisms,
- provide guidance as to how to report potential wrongdoing;
- identify mechanisms for receiving and investigating disclosures;
- ensure the protections and support that eligible whistleblowers may receive;
- where relevant, to meet legal and regulatory obligations; and
- help to ensure that Uniting maintains the highest standards of ethical behaviour and integrity.

#### Uniting:

- Encourages representatives with information about any wrongdoing to report such wrongdoing to the Whistleblower Protection Officers.
- Takes all reports of potential wrongdoing disclosures seriously. The response that Uniting makes, including the investigations process that it follows and the protections that it implements, will depend on the nature and circumstances of the relevant disclosure. All reports will be carefully considered, and a decision will be made as to whether they should be investigated in line with Uniting's investigation processes.
- Is committed to making sure that all disclosures will be treated confidentially, and appropriate protections will be available to eligible whistleblowers, including their right to be safe from any form of detrimental conduct resulting from a disclosure under this policy, such as maintaining disclosers confidentiality to people involved.
- Will keep appropriate records of all disclosures, any inquiries, investigations and their outcomes, and any decisions or recommendations made, ensuring appropriate security is maintained.

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 Representatives who intentionally make false reports may be subject to disciplinary action.

Uniting's Whistleblower Protection Officers will facilitate the receipt and consideration of allegations of wrongdoing under this Policy. Uniting Whistleblower Protection Officers will coordinate the objective investigation of allegations to ensure the safeguarding of the interests of the whistleblower.

Uniting's Whistleblower Protection Officers are the Executive General Manager, Performance & Integration, and General Manager, Quality & Compliance.

Whistleblower Protection Officer Uniting (Victoria and Tasmania) Limited 130 Lonsdale Street, Melbourne Tel: (03) 9192 8100 Email: <u>whistleblowerprotectionofficer@vt.uniting.org</u>

Where representatives do not feel comfortable reporting to either of these roles, they may contact the Chair of the Audit and Risk Committee or other eligible recipients.

	• The Board (or the delegated Board Committee) is responsible
	for approving this policy, any changes to it and overseeing
	compliance with this policy
Responsibility	<ul> <li>Management are responsible for ensuring that policies are</li> </ul>
Responsibility	operating effectively and being adhered to
	• In the first quarter of each financial year management will
	report to the Board regarding adherence to approved policies

and any required improvement plans

Term	Meaning
Allegations	Allegations of wrongdoing raised by a Whistleblower made under this policy.
Representatives	Includes Board members, employees , volunteers, contractors, interns and other representatives of the Uniting. To the extent that Uniting is required to comply with Whistleblowing legislation, representatives also includes current and former employees and suppliers, as well as their relatives and dependants (eligible whistleblowers).
Whistleblowing	The disclosure by representatives (eligible whistleblowers) of alleged wrongdoing occurring within or in relation to Uniting

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Term	Meaning
	to persons that are authorised to investigate and effect action (eligible recipients).
Eligible Whistleblower	Any representative who makes a disclosure of potential wrongdoing under this policy or otherwise under applicable Whistleblower Legislation
	Includes any suspected or actual misconduct that is in breach of general law, policies, procedures and code of ethics, or generally recognised principles of ethics. This may include, but is not limited to:
	dishonest, fraudulent or corrupt conduct;
	<ul> <li>conduct in breach of state or federal legislation;</li> <li>illegal, immeral or illegistimate practices;</li> </ul>
	<ul><li>illegal, immoral or illegitimate practices;</li><li>maladministration or serious and substantial waste of</li></ul>
Wrongdoing/	resources;
Potential	<ul> <li>practices endangering the health or safety of</li> </ul>
Wrongdoing	representative or the general public;
	practices endangering the environment
	Wrongdoing, for the purpose of this Policy, does not
	generally include personal work-related grievances except in
	limited circumstances, including if the disclosure has significant implications for Uniting that do not relate to the
	whistleblower. However, representatives are encouraged in
	all cases to report if there is any uncertainty whether
	particular conduct is a wrongdoing under the policy.

### 2. Related Legislation/Regulations

The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)/ Corporations Act 2001 Cth Part 9.4AAA

## **3. Related Documents**

Code of Conduct People and Culture Policy Privacy Policy Protected Disclosure Protocol Open Disclosure Protocol Whistleblower Procedure Policy Name: Whistleblower Policy Document Number: UP-029 Policy Area: Quality, Risk and Compliance Policy Owner: General Manager, Quality & Compliance Endorsed by: Board Version Number: 2.0

Revision Record					
Version	Date	Document Writer	Revision Description		
0.0	19/11/2019	<i>Manager Policy and</i> <i>Procedures</i>	<i>Transfer policy statements from UCA Whistleblower Policy to correct Policy template</i>		
0.1	19/11/2019	Senior Manager, Compliance Policy and Procedures	Updates		
0.2	20/11/2019	Manager Policy and Procedures	Incorporate feedback from staff review panel		
1.0	04/12/2019	Board	Approved by the Board.		
2.0	30/11/2020	<i>GM, Quality &amp; Compliance</i>	Update Uniting address and roles.		