



Whistleblower Policy

What This Policy Aims To Do	Ensure that clients, carers, families, and Wallara staff can in good faith raise concerns about breaches of Wallara’s legal or ethical standards without fear of reprisal, dismissal or discriminatory treatment.
Who This Policy Applies To	All staff
Who Is The Document Owner?	The CEO.
What Words In This Policy Mean	<p>“Disclosure” means a concern or allegation of improper conduct that is reported to a Protected Disclosure Officer.</p> <p>“Improper conduct” means conduct of any person that is serious enough to be, if proved, a criminal offence or reasonable grounds for dismissal and that:</p> <ul style="list-style-type: none">• Is dishonest, fraudulent or corrupt;• Is a substantial mismanagement of Wallara’s resources;• Involves a substantial risk to clients, Wallara staff, public health and safety or the environment;• Misuses information or material acquired in the course of the performance of the person’s duties; or• Is action taken against a Wallara staff member as a result of that staff member making a report under this or any other policy. <p>“Protected Disclosure Officers” are senior Wallara managers with designated responsibility for receipt and acknowledgement of allegations of improper conduct reported to them under this Policy. The CEO and the Senior HR Coordinator are designated Whistleblower Protection Officers. In addition, the Chairman of the Board of Directors is also a Designated Protection Officer.</p> <p>“Protected disclosure” means an allegation made where a person, public officer or public body has engaged, is engaging or proposes to engage in improper conduct; or take detrimental action against a person.</p> <p>“Staff” refers to Wallara’s directors and all persons engaged by or on behalf of Wallara, including employees, contractors, sub-contractors and volunteers.</p> <p>“Wallara” means Wallara Australia Limited.</p>

Responsibilities	All staff are responsible for adhering to this policy.
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Policy

Wallara is committed to ensuring staff behave professionally, ethically and in accordance with the law, Wallara’s Code of Conduct and all relevant Wallara Policies and Procedures.

Wallara encourages anyone with concerns about actual or suspected improper conduct to report those concerns to the Protected Disclosure Officers. A disclosure may be made by any person and may be made anonymously.



Wallara will protect people that make disclosures in good faith (Whistleblower) even if the allegations are not ultimately proven including:

- If the Whistleblower is a Wallara staff member, Wallara will ensure there are no adverse impacts on their position or future career; and
- If the Whistleblower is a client, a family member, guardian or member of a client's natural supports, Wallara will ensure there are no adverse impacts on the service the client receives immediately and in the future.

People are not entitled to protection under this policy and could face disciplinary action up to and including dismissal, where that person makes a disclosure maliciously, to seek personal gain or based knowingly on false information.

To support this policy, Wallara will:

- Promote this policy to clients as part of Wallara's suite of complaints and incident reporting mechanisms, and ensuring clients, their families and carers are aware of opportunities to report wrongdoing;
- Ensure Wallara staff are trained in this policy;
- Make the contact details of its Protected Disclosure Officers publicly available;
- Promote external avenues for complaints where the Whistleblower would prefer not to report directly to Wallara;
- Maintain the confidentiality and security of disclosures and the identity of the Whistleblower within the law (see below);
- Take action to resolve and rectify any wrongdoing as far as is practicable.

Wallara will maintain the confidentiality and security of disclosures within the law. This means that where possible, privacy and confidentiality of the Whistleblower and the content of the reported allegations will be protected and contained to a minimum "needs to know" basis. However, there are on occasions legislative or standard mandatory reporting obligations (e.g., allegations of assault, Disability Worker Exclusion Scheme) which take priority over confidentiality considerations.

Protected Disclosure Officers will:

- Co-ordinate confidential internal reporting and record-keeping about disclosures from a Whistleblower so as to comply with this policy;
- Receive referrals of disclosures from external agencies such as the Disability Services Commissioner, Victorian Ombudsman or the Independent Broad-Based Anti-Corruption Commission (IBAC) and ensure that such referrals are handled in accordance with this policy;
- Impartially assess each disclosure;
- Ensure ongoing communication with and feedback to the Whistleblower, if the Whistleblower wishes for this;
- Ensure that the Whistleblower receives support to promote their ongoing health and wellbeing;
- Ensure that allegations of improper conduct are investigated where necessary in accordance with Wallara's Investigations Policy and Procedure or the Staff Disciplinary Policy (as appropriate).

Protected disclosures under the Protected Disclosure Act

Wallara is not able to receive complaints about corruption in the public sector. These are known as "protected disclosures" and are subject to the Protected Disclosure Act 2012 (Vic). For example, a person may have a complaint



about corrupt conduct by a government official who is responsible for administering service contracts with Wallara – this would potentially be a “protected disclosure”. Receipt, handling and investigation of such protected disclosures are the responsibility of IBAC, the Victorian Ombudsman and other government agencies.

These agencies may refer complaints to Wallara where it is considered that the complaint is not a “protected disclosure” and subject to the jurisdiction of those agencies, in which case this policy will apply.

Wallara will offer these agencies all reasonable assistance in investigating any protected disclosure under this Act and will not take any action that would prejudice an investigation carried out by these government agencies.

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- Extra Points** This policy does not apply where the issue does not relate to improper conduct including matters involving:
- Staff grievances which are covered by Wallara’s Staff Grievance Policy and Procedure; and
 - Complaints or concerns from clients, their natural supports or advocates about service delivery, which are covered by Wallara’s Complaints Policy and Procedure.

It may be difficult to decide whether a concern should be raised under this policy or under the complaints or grievance policies (or under both). If a client, advocate or staff member is in doubt as to the correct route to follow, they are encouraged to raise the concern under this policy and the Protected Disclosure Officer will decide how the concern should be dealt with.

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- Related Documents**
- Appropriate Workplace Behaviour Policy and Procedure
 - Client Incident Investigations Policy
 - Code of Conduct
 - Complaints Policy
 - Fraud Risk Management Policy
 - Incident Management & Reporting Policy
 - Staff Disciplinary Procedure
 - Staff Grievance and Issues Policy and Procedure

Legislation This Policy Is Based On Protected Disclosure Act 2012 (Vic)

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- Standards This Policy Is Based On** NDIS Core Practice Standards:
- Standard 2. Governance and Operational Management
 - Governance and Operational Management
 - Incident Management

Date Created	Date Approved	Date Revised	Version control	Approved By	Amendment details
25.5.2016	25.08.2016		1	Senior Leadership Team	Reviewed Policy.
		14.9.2020	2	Senior Leadership Team	Reviewed Policy.
		17.5.2023	3	Senior Leadership Team	Reviewed & Approved Policy.