



Servants Community Housing Limited

ABN: 86 623 370 034

Whistleblower Policy for Residents

Key Points for Residents

We have recently updated our Whistleblower Policy. This Whistleblower Policy and Procedure has been developed so that people can raise concerns regarding situations where they believe that someone has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct. The policy encourages you to report this conduct, whilst also keeping you safe and your details private where possible.

A full copy of the policy is available to you, however below please find the key points.

What is Reportable Conduct?

Reportable Conduct is any past, present or likely future activity or behaviour considered to be:

- dishonest
- corrupt (including soliciting, accepting or offering a bribe, or facilitating payments or other such benefits)
- fraudulent
- illegal (including theft, drug sale or use, violence or threatened violence, or property damage)
- in breach of regulation, internal policy or code (such as our Code of Conduct)
- endangering health or safety
- damaging or substantially risking damage to the environment
- detrimental to Servants Community Housing's financial position or reputation

What is not Reportable Conduct?

While everybody is encouraged to speak up and report any concerns to us, not all types of conduct are intended to be covered by this Policy or by the protections under the Corporations Act 2001.

For example, this Policy does not apply to complaints or grievances by residents about a service unless the grievance includes victimisation due to whistleblowing.

What information do I need to make a report?

For your report to be investigated, it is helpful to us if you can provide as much information as possible. The kinds of information that are helpful include:

- approximate date, time, and location of the incident
- name of person(s) involved
- possible witnesses to the events
- any relevant evidence you can provide

How can I make a report?

A report may be made to any of the following:

- The Whistleblower Protection Officer. At Servants, this is the Public Officer of the Board and can be contacted at secretary@servants.org.au.
- Chair of the Board
- CEO

- Business Manager

How will I be protected if I speak up about Reportable Conduct?

While we encourage you to identify yourself to a Whistleblowing Protection Officer you may opt to report your concerns anonymously such as by adopting a pseudonym.

If you have reasonable grounds to suspect Reportable Conduct, even if it turns out your concerns are mistaken, we will support and protect you and anyone else assisting in the investigation.

This protection applies regardless of whether any concerns raised in a report are found to be true, provided that you are acting honestly and ethically and made the report on reasonable grounds.

How will we ensure confidentiality?

We do encourage you to disclose your identity when raising a concern as this will assist us to gather further information on your report. If you choose to disclose your identity, your details will be kept confidential where possible in connection with the investigation. We will take measures to protect your identity such as by removing your personal information, storing your information and disclosure securely, referring to you in a gender neutral context and only allowing qualified staff to investigate your disclosures.

You can however choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised and we will do all it can to protect your confidentiality.

False reports and disclosures

Protected disclosures must be made on reasonable grounds. Anyone who knowingly makes a false report/disclosure of Reportable Conduct may be subject to disciplinary action.

How do we handle and investigate a disclosure?

Upon receiving a Protected Disclosure, within 10 days, we will endeavour to assess the disclosure to determine whether:

- It qualifies for protection; and
- A formal, in-depth investigation is required.
- We will also endeavour provide you with regular updates where possible

Outcome of an investigation

At the conclusion of the investigation, a report will be prepared outlining:

- A finding of all relevant facts
- A determination as to whether the allegation(s) have been substantiated or otherwise
- The action that will be taken, which may include disciplinary action
- The disciplinary action will be dependent on the severity, nature and circumstances of the Reportable Conduct.

Where possible and appropriate, and in line with our privacy and confidentiality obligations, the whistleblower will be informed of the outcome of any investigation into their concerns.

Related policies

Whistleblowing Procedure

Complaints and Appeals Policy and Procedure

Code of Conduct Policy

Legislation and standards

This policy implements the obligations of Servants under:

- Corporations Act 2001 (Cth)
- Public Interest Disclosure Act 2012

This policy & procedure is not intended to override any industrial instrument, contract, award or legislation.

Transparency and accessibility

This policy will be available on the Servants Community Housing website
<https://www.servants.org.au/policies-procedures/>.

Review

This policy was written in April 2019 and was reviewed April 2022. It is scheduled for review in April 2023.