

Co.As.It. Community Services Ltd is committed to conducting its operations and delivering services with integrity and in accordance with the highest ethical and legal standards. A culture that encourages the reporting of suspected misconduct or wrongdoing in a safe environment and without fear of reprisal, is promoted.

Individuals who make such reports are protected from retaliation and all insights gained from the reports and investigation will guide and support the organisation's continuous improvement efforts.

SCOPE

This policy applies to reports identified as a 'Whistleblower Disclosure'. It does not apply to making a general complaint or an employee grievance.

Disclosures which are found to be deliberately false, vexatious, or otherwise manifestly unreasonable are not protected and will be treated by Co.As.It. as a very serious matter. Individuals who make such disclosures may be subject to civil or criminal liability as well as disciplinary action by Co.As.It.

Eligible Whistleblower Disclosures

These may include suspected actions of:

- fraud, corruption, money laundering or misappropriation of funds
- dishonest or unethical behaviour and practices
- violence, abuse, neglect or exploitation
- financial irregularities, theft, embezzlement
- failure to comply with legal obligations, including Corporations Act 2001 (Cth) and other laws
- conduct that poses danger to the health or safety of others
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure under this procedure, regardless of whether they are an eligible Whistleblower.
- other serious misconduct that may materially damage Co.As.It.'s reputation, or otherwise be detrimental of Co.As.It.
- any other act that would be considered to be serious improper conduct

Eligible Whistleblower

Eligible Whistleblowers entitled under the Whistleblower protections include:

- an employee or volunteer
- a Director of the Board
- a client engaging in Co.As.It. services
- a supplier of goods or services

- a relative of an individual or a dependent of the spouse of an individual referred to above

Whistleblowers can choose to remain anonymous and will receive protection under the provisions of the *Corporations Act 2001* and other applicable legislations.

Co.As.It. encourages Whistleblowers to put their name to a disclosure. Anonymous disclosures may limit Co.As.It.'s ability to complete a thorough investigation, seek additional information to assist the investigation, or provide feedback on the outcome of the investigation.

A person making a disclosure may also have an obligation to make a report to a statutory body (e.g. Australian Health Practitioner Regulation Agency). In these cases, the individual should ensure that they comply with all such reporting requirements.

CONFIDENTIALITY

All disclosures will be treated confidentially. A Whistleblower's identity and any information they disclose will not be shared with anyone who is not involved in the investigation of their disclosure, unless where required by law or required to disclose to the Aged Care Quality and Safety Commission, the NDIS Commission, the Australian Federal Police or a legal practitioner, or the Whistleblower has consented to their details being shared.

If a Whistleblower makes a disclosure that includes details of their identity, or any other information which could be used to identify them, the person who received their disclosure will ask the Whistleblower to consent to this information being disclosed to the necessary personnel dealing with their disclosure.

If the Whistleblower does not wish for this information to be included, their disclosure will be de-identified before it is escalated for investigation.

All documents and other materials relating to any disclosures will be stored and dealt with securely.

Public interest and emergency Disclosures

A Whistleblower can make an "emergency disclosure" to member of parliament or the media where they believe there is a substantial and imminent danger to the health and safety of one or more persons at Co.As.It. or to the natural environment.

A whistleblower can make a "public interest disclosure" where 90 days have passed after making a disclosure and the whistleblower still reasonably believes that:

- action has not been taken after providing sufficient information to investigate the report; and
- further disclosure is in the public interest.

The whistleblower must give written notice to Co.As.It. before making a public Interest disclosure as defined above and stating that they intend to make a public interest report. The whistleblower should also consider obtaining independent legal advice before making an emergency or public interest disclosure.

PROCESS FOR WHISTLEBLOWERS

Making a Disclosure

A disclosure can be made confidentially, in writing, to the Chief Executive Officer (CEO).

Any disclosure that may potentially involve the Chief Executive Officer, can be forwarded to the Company President via email to president@coasit.asn.au.

To assist Co.As.It. in conducting a thorough investigation, disclosures should provide as much detail as possible about the alleged misconduct eg.:

- individuals involved
- dates and timelines
- any further information to support the disclosure eg. documents/records/supporting evidence
- contact details (if the disclosure is not anonymous)

Investigation of disclosure

Co.As.It. will investigate all disclosures, unless in the event that there is not sufficient information to identify or assess the matter.

Co.As.It. reserves the right not to progress a disclosure if the level of anonymity prevents it from obtaining sufficient detail to understand the matter and clarification for additional information cannot be obtained because the Whistleblower cannot be contacted, or if the disclosure does not meet the criteria for a Whistleblower disclosure under the applicable legislation.

Upon receipt of a disclosure, Co.As.It. will acknowledge receipt of the disclosure (unless anonymous) and assess whether the information disclosed falls within the scope of this policy and if Whistleblower protections apply. During this time, the discloser will be treated as though Whistleblower protections apply.

If the disclosure is assessed as being covered in this policy and further investigation of the matter raised in the disclosure is warranted, the CEO may delegate the investigation to a senior management team member who has appropriate training to complete the responsibilities under this policy. An external investigator may be appointed to conduct the investigation, either in conjunction with, or independently of, an internal appointee.

Where an investigation will be undertaken, Co.As.It. will ensure the process is objective, fair and independent. Therefore, any person appointed to investigate the disclosure will be independent of the whistleblower and any individuals who are the subject of the disclosure, as well as any connected staff members.

The CEO or delegated senior management team member will:

- verify and investigate the facts of the disclosure
- record and document all information related to the investigation
- conduct the investigation objectively and maintain an independent perspective
- carry out the investigation within the scope of their responsibilities
- keep the CEO informed during the investigation, if it has been delegated
- maintain confidentiality throughout the process
- provide regular updates on the progress of the investigation to the Whistleblower

(unless anonymous), where possible and appropriate

Conclusion of Investigation

At the end of an investigation, the delegated senior management team member will submit a detailed report to the CEO. The report will summarise the conduct of the investigation, the information and evidence collected, draw conclusions about the extent of any reportable conduct and recommend an appropriate course of action to remedy any reportable conduct to ensure it does not recur, if applicable.

A report of the investigation and agreed actions will be provided to the Co.As.It. Board of Directors, by the CEO.

Where appropriate, the Whistleblower will be informed when the investigation has been completed (unless the discloser is anonymous). There may be circumstances where it may not be appropriate to provide details of the outcome to the Whistleblower.

Protections and Ongoing support for Whistleblowers

Co.As.It. is committed to taking all reasonable steps to safeguard the identify of a Whistleblower and wherever possible and practicable, will make appropriate adjustments to the workplace arrangements to protect them from negative or adverse consequences arising from their disclosure.

All Co.As.It. employees have an important responsibility concerning the welfare of the Whistleblower and must refrain from any actions that could be perceived to be or constitute victimisation of a person who makes a protected disclosure.

Co.As.It. will investigations any allegations of any adverse actions or victimisation taken against a Whistleblower.

If a Co.As.It. employee is found to have engaged in a detrimental act, threatened such an act, or victimised a Whistleblower or any person involved in an investigation, disciplinary action will be taken. This may include termination of employment.