

TITLE	Whistleblowing Policy
TARGET AUDIENCE	All employees, consultants, contractors, sub-contractors, casual staff, volunteers and board members
SCOPE	All Cabrini Sites and Services

Contents

1. Policy	2
1.1 Policy Statement.....	2
1.2 Purpose.....	2
1.3 Definitions and Descriptions.....	2
1.4 Scope	3
2. Roles and Responsibilities	3
2.1 Integrity Governance Officer	3
2.2 Integrity Protection Officer.....	4
2.3 Managers and Supervisors	4
2.4 Whistleblowers.....	4
3. Reporting	4
3.1 Line management	4
3.2 Integrity Governance Officer	5
4. Protection and Confidentiality	5
4.1 Confidentiality	5
4.2 Protection	5
5. Investigation.....	6
6. Key Legislation, Standards and Other Documents	6
7. Document Control	6

1. Policy

1.1 Policy Statement

Cabrini's values, outlined within our code of conduct – 'Our Promise' – reinforce our culture of respect, integrity and honesty and our commitment to acting legally and ethically throughout our operations.

Cabrini recognises that achievement of and adherence to our values is supported by encouraging all people involved with Cabrini, including those with a work, client or supply relationship, to feel comfortable with reporting any wrongdoing. Cabrini acknowledges the importance of managing the confidentiality of anyone who reports wrongdoing as well as protecting those that report from any detrimental action.

Under this policy, Cabrini is committed to:

- Handling all reports confidentially and securely (as required);
- Undertaking necessary actions to safeguard the wellbeing of Whistleblowers; and
- Providing feedback to Whistleblowers on the outcomes of their report.

1.2 Purpose

This document formalises Cabrini's stance and processes for receiving and investigating reports from Whistleblowers, as well as managing their confidentiality and welfare.

Through establishing governing roles and standard practices; staff, contractors, clients and all Cabrini stakeholders can be confident that Whistleblowing reports will be handled professionally and confidentially.

1.3 Definitions and Descriptions

'Whistleblowing': "The disclosure by or for a witness, of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing".

A 'Whistleblower': "A person who reports serious wrongdoing in accordance with this policy".

This policy refers to reportable conduct as ***'Wrongdoing'***, which includes conduct that, in the view of a Whistleblower acting in good faith, is:

- Illegal, or in breach of regulations;
- Fraudulent or corrupt (as defined in Cabrini's Fraud and Corruption Control Plan);
- Unethical, including acting disrespectfully, dishonestly or wilfully breaching Cabrini's Code of Conduct, or any other Policy;
- Seriously harmful or has the potential to be seriously harmful, including deliberate unsafe work practices or disregard for standard operating procedures; and/or
- Represents a serious mismanagement of Cabrini resources.

If a potential Whistleblower has any doubt as to whether the conduct meets the criteria of 'Wrongdoing' they are encouraged to discuss it informally through one of the reporting channels outlined in section three, 'Reporting'. In this regard, Cabrini takes the approach of 'If in doubt, speak up'.

A 'Report': within this policy, refers to a disclosure of wrongdoing made by a Whistleblower.

‘Detrimental Action’: a negative action or the threat of such action taken against a Whistleblower in connection with them making a report of wrongdoing, and includes:

- Action causing injury, loss or damage;
- Intimidation or harassment; and
- Discrimination, disadvantage or adverse treatment in relation to a person’s employment, career, or business, including the taking of disciplinary action (such as demotion or dismissal).

1.4 Scope

This policy applies to Cabrini employees, consultants, contractors, sub-contractors, casual staff, volunteers and board members. Additionally, clients, suppliers and members of the public can make a report under this policy.

2. Roles and Responsibilities

This policy establishes two roles, that of the ‘Integrity Governance Officer’ and the ‘Integrity Protection Officer’ as well as defining responsibilities of Whistleblowers and management staff across Cabrini.

2.1 Integrity Governance Officer

Reports of actual or suspected wrongdoing can be made to the Integrity Governance Officer (IGO). The Integrity Governance Officer is responsible for:

- Appointing a suitable Integrity Protection Officer and putting them in contact with the Whistleblower to support them in line with section four of this policy – ‘Protection and Confidentiality’.
- Coordinating the investigation of the report by appointment of:
 - An appropriate internal investigator who is independent of the area where the wrongdoing is alleged to have occurred, or
 - An appropriate external investigator independent of Cabrini where considered necessary.

The Integrity Governance Officer may also act as the investigator, if this does not present a conflict of interest.

Cabrini have appointed two Integrity Governance Officers, one internal and one external. Their names and contact details are:

Internal Contact	External Contact
Andrew Ryan Director People Services integrity@cabrini.com.au (03) 9508 5314	Graham Noriskin Executive Director Pitcher Partners Consulting Graham.Noriskin@Pitcher.com.au (03) 86105620

Integrity Governance Officers can be contacted via the phone or email addresses provided.

The Integrity Governance Officers have direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the CEO or the Board, as may be required to satisfy the objectives of this Policy.

2.2 Integrity Protection Officer

The Integrity Protection Officer is appointed to provide protection to the Whistleblower according to this policy. The Whistleblower Protection Officer will provide mentoring and other support deemed necessary by them.

They are responsible for keeping the Whistleblower informed of the progress and outcomes of the investigation subject to considerations of privacy of those against whom the allegations have been made.

The Integrity Protection Officer will be the Executive Director, People and Culture. If this presents a conflict of interest when considering the particulars of the report, the Integrity Governance Officer will appoint a suitable alternative officer.

2.3 Managers and Supervisors

Managers and Supervisors across the organisation have a responsibility to respond to reports of wrongdoing from their staff and any external stakeholders they deal with in a professional and confidential manner. This includes escalating these to an Integrity Governance Officer where necessary and at all times protecting the Whistleblower's confidentiality.

2.4 Whistleblowers

A Whistleblower should have direct knowledge of the conduct being reported, or have reasonable grounds to suspect it having occurred.

Whistleblowers are expected to act in good faith and should be aware that reports that are found to be knowingly false, of a trivial nature or made maliciously could result in disciplinary action.

3. Reporting

A number of channels are in place for the purpose of receiving reports from Whistleblowers. A whistleblower may choose whichever channel they believe is most appropriate.

If a potential Whistleblower has any doubt as to whether the conduct meets the criteria of 'Wrongdoing' they are encouraged to discuss it informally through one of the reporting channels outlined in this section, 'Reporting'. In this regard, Cabrini takes the approach of 'If in doubt, speak up'.

3.1 Line management

It is important to note that, on occasion, what may appear to be wrongdoing can be caused by a misunderstanding or necessary confidentiality. In these cases, a resolution may be arrived at by discussing the alleged wrongdoing with management in the area that the conduct occurred.

For internal Whistleblowers, they may wish to raise their concerns with their supervisor, or with their supervisor's manager.

For external Whistleblowers, they may wish to raise their concerns with the manager of the member of staff they regularly engage with.

However, should any of the following apply then the Whistleblower may choose to make the disclosure directly to an internal or external Integrity Governance Officer.

- The Whistleblower does not feel comfortable discussing the wrongdoing with line management or does not believe that line managers are appropriately independent of the wrongdoing;
- After discussing the matter within line management the Whistleblower is not satisfied with the outcome; and/or

- The conduct to be reported is of a highly serious nature or the Whistleblower believes urgent action is required.

Additionally, if after discussing the matter with line management, either the Whistleblower or the manager becomes aware through further information or preliminary investigation of the matter, that the wrongdoing is of a serious nature, then an Integrity Governance Officer should be notified immediately.

3.2 Integrity Governance Officer

Serious Whistleblower reports from both internal and external people should be directed to an Integrity Governance Officer.

4. Protection and Confidentiality

Cabrini recognises the importance of both Whistleblower confidentiality and protection and takes its responsibility to manage these seriously.

4.1 Confidentiality

A whistleblower retains the right to remain anonymous. If the Whistleblower willingly discloses their identity, Cabrini will take all reasonable and legal steps to protect the identity of a Whistleblower. The Integrity Protection Officer will be the Whistleblower's primary point of contact and will manage their privacy in conjunction with the Integrity Governance Officer coordinating the investigation into the matters reported.

Cabrini will not disclose the Whistleblower's identity unless one of the following conditions apply:

- The Whistleblower has consented to the disclosure; or
- The disclosure is required by law (for example, to further a criminal investigation).

Whistleblowers should be aware that when a report is investigated it may become necessary to disclose details of the report to other personnel involved in the investigation or, through the investigative process, elements of the reported conduct may become obvious to the subject(s) of the report. While Cabrini will take steps to avoid the identity of the Whistleblower becoming clear, it should be acknowledged that in the circumstances outlined, this may not be possible. In these and other cases, actions will be taken to protect the Whistleblower from any detrimental actions.

4.2 Protection

Cabrini acknowledges that the best protection afforded to a Whistleblower is confidentiality. In addition to this, Cabrini will undertake protective actions to prevent any disadvantage to the Whistleblower as deemed necessary by the Integrity Protection Officer.

Protective actions will be undertaken with an aim to prevent any detrimental action to the Whistleblower. Protective actions will depend on the circumstances surrounding the Whistleblower and the report made.

Any retaliatory actions undertaken by Cabrini staff in reprisal for the filing of a report will be treated seriously, investigated and may result in disciplinary action.

If a Whistleblower believes they have experienced detriment following their report they should first discuss this with their Integrity Protection Officer. If the Whistleblower does not believe the issue has been resolved in a satisfactory manner, they may discuss this with an Integrity Governance Officer.

5. Investigation

Cabrini will investigate all Whistleblower reports and keep the Whistleblower informed of the outcomes of the investigation, subject to considerations of privacy and confidentiality (including those of the subject of the report).

The investigator will either be an Integrity Governance Officer, or another person appointed by the Integrity Governance Officer, who may be internal or external to Cabrini. The investigator will have appropriate experience to carry out the role, at the discretion of the Integrity Governance Officer.

An internal investigator will be independent of line management in the area of the whistleblowing report. The investigator's role is to examine the substance of the report:

- Fairly and objectively;
- In line with best practice for investigations; and
- Independently of the Whistleblower, the applicable area of Cabrini operations and the subject of the report.

Where an investigation verifies any wrongdoing, Cabrini is committed to rectifying this, including taking disciplinary action as necessary.

6. Key Legislation, Standards and Other Documents

This document has a close relationship with the following:

Legislation

- Corporations Act 2001 (Cth)
- ASIC Act 2001

(Cth) Standards

- Australian Standard on Fraud Control and Corruption Control (AS 8001: 2008);
- Australian Standard on Whistleblower Protection Program for Entities (AS

8004: 2003) Related Cabrini Materials

- Fraud and Corruption Control Plan

7. Document Control

Executive Sponsor	Executive Director People and Culture	
Content Approved By:	CHEX	Date: 9 November 2016
Authorised to Publish By:	Audit and Risk Management Committee	Date: 16 February 2017
Content Reviewed By:	Jason Aquilina, Director of Finance	Date: 2 nd March 2017