Whistleblower Protection

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Background

The Greek Orthodox Community of South Australia (GOCSA) is committed to acting with integrity in accordance with our purpose and values. This policy encourages people to recognise and report any misconduct or wrongdoing or other conduct that is against our purpose and values. Following disclosure, GOCSA will protect the whistleblower and ensure they do not experience any adverse consequences as a result. While this policy is designed to support and protect all whistleblowers, formal protection under the *Corporations Act* can only be accessed where the disclosure relates to a disclosable matter.

As stated in the ASIC Regulatory Guide 270, "transparent whistleblower policies are essential to good risk management and corporate governance. They help uncover misconduct that may not otherwise be detected. Often, such wrongdoing only comes to light because of individuals (acting alone or together) who are prepared to disclose it, sometimes at great personal and financial risk."

This whistleblower protections policy outlines how GOCSA supports and protects whistleblowers in accordance with the *Corporations Act 2001* (Cth).

Definitions

Whistleblower	Any person who discloses or reports actual or suspected misconduct or wrongdoing
Disclosable matters	Information that concerns 'misconduct' or 'an improper state of affairs' or circumstances in relation to the company
	Conduct the company, its officers or employees have engaged in which constitutes an offence or contravention of various laws, including any law of the Commonwealth punishable by imprisonment for a period of 12 months or that represents a danger to the public or financial system
Misconduct	Illegal, unacceptable or undesirable conduct or behaviour (actual or attempted) that is: dishonest, unethical, fraudulent, corrupt, non-compliant or may give rise to questionable accounting or auditing practices, may cause financial loss, or acts inconsistent with the organisation's purpose, values and code of conduct.

Scope

All public companies including not-for-profits in Australia with greater than \$1M\$ annual revenue.

Applicability

- · all categories of employees
- · governing body
- all volunteers
- · contractors and consultants, whether or not they are employees
- all other service providers and suppliers

Consumer Statement

I get quality care and services when I need them from people who are knowledgeable, capable and caring.

Organisation Statement

The workforce is recruited, trained, equipped and supported to deliver the outcomes required by these standards. Managing business unit for this policy



Home Care Services

Policy Commitment

GOCSA is committed to supporting whistleblowers report any misconduct or wrongdoing and protecting them from any adverse consequences following disclosure. Examples of misconduct or wrongdoing include illegal acts, fraud or misappropriation of funds, breach of legal or regulatory duty, and any act that puts at risk public safety. Personal work-related grievances, such as conflict with another employee or concerns about the employment contract, does not constitute misconduct or wrongdoing for the purposes of this policy.

GOCSA seeks to identify and respond early to any misconduct, wrongdoing and disclosure by:

- Supporting potential whistleblowers access appropriate information e.g. through the Human Resources or Legal department or seeking independent legal advice.
- Allowing disclosures to be made internally or externally, anonymously and/or confidentially, securely and outside of business hours.
- Taking all reasonable steps to support whistleblowers acting with reasonable and honest belief following disclosure and during and after the investigation.
- Not tolerating any threats, acts or omissions designed to cause detriment to a whistleblower (or another person) in relation to a disclosure. This includes dismissal or termination, demotion, reputational damage or injury or damage to person or property.
- Conducting investigations in a fair, objective and confidential manner. Taking appropriate corrective action as warranted by the investigation.
- Ensuring fair treatment of any individuals mentioned in the disclosure informed by the principles of natural justice.
- Ensuring no disciplinary action is taken against a whistleblower when the disclosure was made with a genuine or reasonable belief regarding the misconduct, even when that allegation is incorrect.
- Allowing whistleblowers to make a disclosure to a regulator, legal practitioner. Whistleblowers may also make an
 emergency or public interest disclosure to a journalist or parliamentarian.
- Supporting whistleblowers to access legal remedy or compensation where they have experienced detriment as a result of disclosure.

Process Guidance

Through the process below, our organisation demonstrates it supports whistleblowers to report instances of misconduct or wrongdoing and protects them from any adverse consequences as a result of making the report.

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- Provide education and training to staff on the whistleblower policy with examples of misconduct and wrongdoing and information about how to report misconduct and any personal work-related grievances.
- · Ensure all instances of known or suspected misconduct or wrongdoing are reported to a Senior Manager.
- Investigate all disclosures in a fair and transparent manner according to the principles of natural justice.
- Provide regular feedback to those involved in the disclosure, including throughout and after the investigation.
- Keep confidential and secure records that protect the anonymity or confidentiality of all people involved in the disclosure.
- · Report all disclosures to the Board for oversight and monitoring.

References

Name	Source	
Whistleblowing Information	Australian Securities and Investment Commission	

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