



WD 3.4 Whistle-blower policy

Purpose

The purpose of this policy is to outline the processes for people (participants, guardians, family, employees, students, contractors or volunteers) to report improper or corrupt conduct in relation to any of Carpentaria's services.

Scope of policy

This policy applies to Carpentaria employees, volunteers, students, and contractors who deliver services and supports on behalf of Carpentaria, as well as all Carpentaria participants and their families.

Policy statement

Carpentaria is committed to:

- Safeguarding the safety, health and wellbeing of participants, employees, volunteers, students and contractors at all times
- Conducting its services in a professional, ethical and accountable manner
- Supporting and encouraging any reporting of alleged improper or corrupt conduct where there are objectively reasonable grounds to suspect wrongdoing
- Providing a copy of this policy on request, in addition to being available via internal systems for employees
- Enabling any person to raise issues and concerns, including anonymously
- Making it clear how to report to the Whistle-blower Protection Officer
- Promoting external avenues for complaint where whistle-blowers would prefer not to report directly to Carpentaria
- Maintaining the confidentiality and security of reports
- Respecting whistle-blowers (including their identity) and protecting them from reprisals, discrimination, harassment or victimisation as a consequence of their having made a report
- Acknowledging that whistle-blowers may include current and former company officers, employees, contractors and suppliers, their associates and specified family members
- Immediately reviewing any such allegations and take action to investigate internally consistent with the Carpentaria Investigation Guidelines, or alternatively reporting to external authorities as necessary
- Ensuring that whistle-blowers receive feedback



- Taking action to resolve and rectify any wrongdoing as far as is reasonable and practicable.

Process for reporting improper or corrupt conduct

- Whistle-blowers are to send any disclosures to the attention of “Whistle-blower Protection Officer” via the info@carpentaria.org.au email address, or via PO Box 63 Karama, NT 0813
- Alternatively, contact can be made with the Whistle-blower Protection officer by phoning (08) 8920 9400 or by personal attendance at Harry’s Place Administration Building, 1 Willeroo St, Tiwi

Action following reported allegation of improper or corrupt conduct

Confidentiality and mandatory reporting

Carpentaria will maintain the privacy and confidentiality of the whistle-blower and the content of the allegations are protected and contained to a minimum ‘needs to know’ basis.

However, there are legislative or standard mandatory reporting obligations which must take priority over confidentiality considerations, such as child sexual assault, elder abuse, or sexual abuse of cognitively impaired people.

Protection from adverse action, discrimination or other negative consequences of reporting

People who report allegations are treated with respect and will not suffer any adverse action, reprisals, discrimination, harassment or victimisation as a consequence of their having made a report.

Investigation Process

Carpentaria will investigate all disclosures. Investigations may be conducted either internally or with the support of an external provider, dependent upon the extent of the matter disclosed, the level of objectively reasonable grounds to suspect the wrongdoing,

Feedback and support for whistle-blowers reporting to the Whistle-blower Protection Officer

The Whistle-blower Protection Officer is responsible for:

- Providing feedback to the whistle-blower on the anticipated timeframe for the investigation process and a copy of this policy
- Maintaining contact during the course of the investigation, if the whistle-blower requests this



- Monitoring the health and wellbeing of the whistle-blower and advising them of supports available to them, such as the Employee Assistance Program (refer to WD 3.2 Employee benefits policy)
- Notifying the whistle-blower on completion of the investigation.

(Note: Due to privacy considerations, whistle-blowers are not entitled to know the details of disciplinary action or consequences for people involved in the investigation. They may be informed that the investigation is closed and receive general advice on what action has been taken by Carpentaria.)

Action on completion of investigations

The nominated Whistle-blower Protection Officer is responsible for receiving the investigation report and determining appropriate action/consequences. This is discussed with and approved by the CEO (where the CEO is not implicated in the allegations).

Action can include:

- Consequences for individuals where allegations have been substantiated (e.g. employee disciplinary action, termination of employment, termination of contracts etc.)
- Identifying and developing an action plan to address systemic organisational issues (e.g. gaps in policies, procedures and operational practices) that created opportunity for improper or corrupt conduct to occur
- Reporting the issue, investigation outcomes, immediate action taken and action planned to address systemic issues to the Board.

Responsibility for implementation, compliance monitoring, measuring and continual improvement

Executives are responsible for:

- Ensuring all managers understand their responsibilities under this policy
- Appointing a Whistle-blower Protection Officer
- Appointing appropriate Investigators, where necessary, in the event of an allegation.



Managers, Coordinators and Team Leaders are responsible for:

- Ensuring all employees understand their responsibilities under this policy
- Ensuring participants, their families and guardians and other parties are aware of opportunities and procedures to report wrongdoing.

Existing Carpentaria employees, new or returning employees, those transferring to a new role in Carpentaria, students on placement, contractors and volunteers are responsible for:

- Ensuring they are familiar with the requirements of the policy, and have sufficient skills, knowledge and ability to meet the requirements.

Related policies and procedures

- Diversity and Anti-Discrimination Policy
- Culturally Inclusive Practice Policy
- Participant Personal Relationships, Sexuality and Sexual Health Policy
- Prevention of Abuse and Neglect Policy
- Feedback and Complaints Policy
- Participant and Family Grievances and Dispute Policy
- Employee Supervision Policy
- Employee Grievance Policy
- Prevention of Fraud and Corruption Policy
- Risk Management Policy (Organisational)



Term	Definition
Allegations	Information that suggests improper or corrupt conduct by Carpentaria employees, volunteers, students or contractors.
Corrupt conduct	<p>This means:</p> <ul style="list-style-type: none">• conduct of any person (whether or not an employee) that adversely affects the honest performance of an employee's role or responsibilities or Carpentaria's functions and/or• the performance of an employee's functions dishonestly or with inappropriate partiality or conflict of interest; a conspiracy or attempt to engage in the above conduct. <p>The conduct must be serious enough to constitute, if proved, a criminal offence or reasonable grounds for dismissal.</p>
Improper conduct	<p>Conduct that is:</p> <ul style="list-style-type: none">• illegal• a substantial mismanagement of Carpentaria resources• conduct involving a substantial risk to participants/residents, public health and safety and the environment• conduct by an employee, former employee or Carpentaria that amounts to the misuse of information or material acquired in the course of the performance of their official functions, or• deliberate concealment of the above.
Whistle-blower	A person who makes an allegation of improper conduct or corrupt conduct under the Whistle-blowers Policy to a Whistle-blower Protection Officer.
Whistle-blower Protection Officer	The Whistle-blower Protection Officer is a person with responsibility for receiving and acknowledging allegations made under this policy.

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