

Whistleblowing Procedure

Table of Contents	Whistleblowing Procedure	1
	Whistleblowing Procedure	3
1.	Definitions	3
2.	Who can make a Whistleblower Report?	6
3.	How do I report a concern?	6
4.	Internal Reporting	7
5.	External Reporting	8
6.	Concerning disclosures made to legal practitioner	12
7.	Concerning public interest disclosures	12
8.	Concerning emergency disclosures	13
9.	Where can I get information and advice?	13
10.	Do I have to disclose my identity?	13
11.	Will my identity be treated confidentially?	14
12.	Protection against detrimental conduct	15
13.	Assessing and Controlling the risk of detriment	17
14.	Support and Protection	17
15.	What will Aruma do with the disclosure?	18
16.	Investigation of the disclosure	18
17.	How will the investigation be conducted?	18
18.	Investigator's Report	19
19.	Will the discloser be kept informed?	19
20.	What happens if the misconduct is proven?	19
21.	Avenues for Review	20
22.	What immunities are available to a discloser?	20
23.	What are the consequences of making a false disclosure?	20
24.	How will this policy be made available to officers and employees of our organisation?	21
25.	Training & Education	21
26.	Review of this Policy	21

27. Flowchart: Whistleblowing at Aruma 22

28. Flowchart: Whistleblowing versus Employee Grievance process 23

.....**23**

Relevant Resources24

29. Legislation, external requirements and oversight bodies 24

30. QMS policies, procedures and/or forms..... 24

31. External resources to enhance practice 24

Whistleblowing Procedure

1. Definitions

Detriment

A person may be causing you detriment if they:

- dismiss you from your employment;
- injure you in your employment;
- alter your position or duties to your disadvantage;
- discriminate between you and other employees of the same employer;
- harass or intimidate you;
- harm or injure you, including causing you psychological harm;
- damage your property;
- damage your reputation;
- damage your business or financial position; or
- cause you any other damage.

Disclosure

A report of misconduct.

Under the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act (2019) protections apply to disclosures which have been disclosed by someone who has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances; and the disclosure relates to conduct that:

- is an offence against, or contravention of, a range of specified banking, finance, corporate and insurance legislation;
- is an offence against any other law of the Commonwealth that is punishable by imprisonment of 12 months or more; or
- represents a danger to the public or the financial system.

Discloser

The person who reports misconduct.

Disclosee

The person who is subject to a report of misconduct.

Eligible Recipient

A person who can receive a whistleblower report. This includes:

- A company officer or director (including the Company Secretary);
- A senior manager (including any member of the Executive and Senior Leadership teams);
- An auditor or actuary;
- Regulators;
- Anyone authorised by Aruma to receive disclosures.

Misconduct

Any breach of Aruma's Code of Conduct Policy or any other illegal or unethical behaviour, which includes, but is not restricted to:

- any behaviour that adversely impacts on the rights of our customers;
- criminal or illegal activity;
- unfair or unethical conduct;
- breach of our policies and procedures;
- corrupt conduct;
- 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;
- information that indicates a significant risk to public safety;
- risk to the health or safety of any person;
- mismanagement, serious or substantial waste or repeated instances of breach of administrative procedures;
- any conduct which may cause financial or non-financial loss to Aruma or be otherwise detrimental to the interests of the merged organisation;
- deliberate concealment of any poor or unacceptable conduct; and
- failure to respond appropriately to a report of misconduct.

Whistleblowing

When a discloser including an employee, past employee, customer, their relative, dependent or spouse speaks up about misconduct within, or by, Aruma.

Whistleblowing Protection Officer (WPO)

An employee or Board member who is appointed by the Chief Executive Officer for the purpose of receiving reports of poor or unacceptable conduct. They have had appropriate training to advise and support reporting employees. They have access to the Chief Executive Officer, or any member of Aruma executive leadership team for advice.

The WPO will:

- carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven;
- keep the information provided in a confidential and secure system;
- coordinate and oversee the investigation where an investigator has been appointed;
- appoint a WPC to support and protect the discloser, if necessary, from detrimental acts;
- advise the discloser (through Your Call where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so; and
- take all reasonable steps to ensure fair treatment for and to ensure the identity of the discloser and the person/s who is the subject of the disclosure are kept confidential. An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken. An employee who is the subject of a disclosure may contact the entity's support services by contacting www.convergeinternational.com.au

Whistleblowing Protection Coordinator (WPC)

The WPC is appointed by Aruma to:

- assess the immediate welfare and protection needs of a discloser;
- safeguard the interests of a discloser in accordance with this policy and the law; and
- address any issues or concerns of detrimental acts/detrimental treatment.

Aruma may appoint a person from within the organisation or a third party to be the WPC. The WPC will safeguard the discloser's interest. They do this by protecting the discloser's anonymity when they request this and ensuring they are not victimised.

Victimisation

Actual or threatened detriment.

2. Who can make a Whistleblower Report?

2.1. The following groups of people (past or current) can make a Whistleblower Report ("Disclosers"):

- Employees and officers;
- Contractors, Consultants, suppliers and their employees;
- Volunteers and work experience students
- Directors and associates of the entity or related entity; and
- Spouses or relatives of any of the above.

3. How do I report a concern?

3.1. Follow the procedures outlined in [Internal Reporting](#) and/or [External Reporting](#).

3.2. We will manage grievances in accordance with the Employee Grievance PPM where appropriate. Sometimes, the difference between matters best dealt with through the employee grievance process, versus the whistleblowing process can be complex. Generally, we will manage reports about wrongdoing, which apply to the public interest or the organisation, e.g. fraud, theft, danger to the public or customers through the whistleblowing process.

3.3. Personal work-related grievances are not matters of misconduct which can be reported under this policy and procedure and are not matters which provide specific whistleblower protections to the discloser under Australian law. The grievance procedure is for matters which are of an individual/personal interest. Examples of personal work-related grievances include:

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision relating to the engagement, transfer or promotion of the discloser;

- a decision relating to the terms and conditions of engagement of the discloser; and
 - a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser
- 3.4. Note that some workplace grievances, particularly those involving management, can become so endemic and destructive that they also become a public interest issue. Refer to the Flowchart: [Whistleblowing versus Employee Grievance Process at Aruma](#). The WPO will ensure the disclosure is managed through the most appropriate process.

4. Internal Reporting

- 4.1. **Management:** At first instance, try to raise concerns with your immediate line manager, however, sometimes you may not feel comfortable doing this. In such cases, raise the concern with another manager, either a person outside their reporting line or a more senior manager. The really important thing is that you raise the concern.
- 4.2. **Whistleblowing Protection Officers (WPO):** In rare instances, we recognise that people may not feel comfortable openly reporting a concern to management. There are alternative avenues open to them. We do not want there to be any reason for you to not make a report.
- 4.3. Employees who have transferred to Aruma from the Department of Health and Human Services (DHHS), should make disclosures to the DHHS's Protected Disclosure Coordinators or the Independent Broad-based Anti-Corruption Commission.
- 4.4. Contact the WPO if:
- for some reason, reporting through the management line is considered inappropriate or not possible;
 - a manager or other appropriate employee has been notified but the discloser feels they have responded to the report adequately; or
 - the discloser is concerned about negative repercussions.
- 4.5. **The WPO's are:**

Name: Kim Parish
Location: Belrose, New South Wales
Position: Chief People Officer
Mobile: 0416 444 721
Email: Kim.Parish@aruma.com.au

Name: Tiffany Roxburgh
Location: Belrose, New South Wales
Position: Chief Financial Officer
Phone: 0410 433 295
Email: Tiffany.Roxburgh@aruma.com.au

Name: Laz Cotsios
Location: Carnegie, Victoria
Position: Chief Operating Officer
Phone: 0417 341 782
Email: Laz.Cotsios@aruma.com.au

Name: Leanne Dreves
Location: Queensland
Position: Aruma Board Member
Phone: 0419 407 672

- 4.6. From time-to-time Aruma receives anonymous reports of concern. For example, an anonymous letter, correspondence from an alternative email address, or an unidentified phone number. We will take such concerns seriously, but it is often very difficult to investigate them thoroughly. This is because there may not be sufficient information provided and we cannot obtain further details. It also means that it is not possible to provide any feedback on the outcome of the investigation of the concern.
- 4.7. If a person makes an anonymous complaint, we will encourage them to make a follow-up contact, so we can gather further information and/or advise the outcome of the investigation. We will respect the person's right to remain anonymous and we will not disclose identifying information unless it is necessary.
- 4.8. Any employee who discloses may escalate the matter to a more senior level of management if they are dissatisfied with the management of their report.

5. External Reporting

- 5.1. If someone is concerned about making an internal report, they may report their concerns to a number of external agencies.
- 5.2. **Your Call Disclosure Management Services (Your Call):** In the first instance, we encourage employees to contact Your Call. Aruma has contracted Your Call to receive and manage disclosures with impartiality and confidentially.

Making a disclosure to Your Call:

Disclosures may be made 24 hours a day, seven days a week, in a number of ways:

Website: <https://secured1.yourcall.com.au/>
You can make online reports via this website. Our unique identifier code: ARUMA will be required. You can upload relevant documentation and/or relevant material.

Hotline: 1300 790 228

(9am - 12am Monday - Friday excluding national public holidays)

Live chat: www.whistleblowing.com.au/contact

Email: info@yourcall.com.au

National Relay Service: www.relayservice.gov.au

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

When contacting Your Call, people may choose to:

- remain completely anonymous;
- provide an identity to Your Call only; or
- provide an identity to both Your Call and Aruma.

How Your Call will receive the disclosure

A Your Call Protected Disclosure Officer will receive the disclosure. They will:

- impartially assess the information and clarify the information if necessary;
- take steps to ensure the identity of the discloser is kept confidential and anonymity maintained if requested; and
- provide the discloser with access to the Your Call Message Board where appropriate. This will enable them to remain anonymous if desired and to post questions and information on-line for the attention of Aruma.

Your Call may require further information from the discloser. This is because they may need to clarify the disclosure or to protect the discloser's anonymity when referring the matter to Aruma.

What happens after Your Call receive the disclosure

The Your Call Protected Disclosure Officer will refer the matter, with a copy of any relevant documents or records provided, to Aruma's Whistleblowing Protection Officers (WPO), within one business day.

The Your Call Protected Disclosure Officer will refer the disclosure to Aruma urgently and within 4 hours, if the disclosure involves abuse and/or neglect of a customer.

You can request that we do not notify any of the WPOs.

Upon receiving the disclosure from Your Call, the Whistleblowing Protection Officer will:

- review the disclosure to determine the nature and extent of investigation that is required, or possible, in the circumstances. They will consider whether they or another WPO should refer the disclosure to the police. The appropriate management system will also be considered, which may include, but is not restricted to, the MEAN Policy and Practice Manual and the Notifiable Events Policy;
- ensure we respond promptly and that we adhere to all timelines and practices for mandatory reporting. For example, the Incident Management PPM. If the disclosure relates to MEAN towards a customer in Victoria, the discloser will also be advised to notify the Disability Services Commissioner;
- be responsible for notifying appropriate management and/or employees of the disclosure;
- establish and maintain a confidential filing system;
- be responsible for overseeing any subsequent investigations;
- ensure the discloser is protected from victimisation;
- advise the discloser (through Your Call where anonymity has been sought) of the progress of the matter when appropriate to do so; and
- take all necessary steps to ensure we keep the identity of the discloser and the disclosee confidential.

Clive Peter, Executive General Manager, People and IR, may act as a WPC for human resource related matters. John Cleary, General Manager, Regulatory Compliance, may act as a WPC for non-human resource related matters. In cases where these staff members are unavailable, or not notified

of a disclosure, a Whistleblowing Protection Officer will be nominated to act as the WPC.

5.3. **External Agencies:** There may be circumstances where employees choose to report to other external agencies:

5.4. **All states and territories:**

- The National Disability Insurance Agency, 1800 800 110;
- The Complaints Resolution and Referral Service, Phone: 1800 880 052;
- The police;
- The National Disability Abuse and Neglect Hotline: 1800 880 052.

5.5. **Australian Capital Territory:**

- ACT Human Rights Commission, Phone: (02) 6205 2222;
- Public Advocate of the ACT, Phone: (02) 6207 0707;
- WorkSafe ACT, Phone: (02) 6207 3000.

5.6. **New South Wales:**

- Anti-Discrimination Board of New South Wales, Phone (02) 9268 5544;
- Ombudsman New South Wales, Phone (02) 9286 1000;
- Safe Work NSW, Phone: 13 10 50.

5.7. **Queensland**

- Antidiscrimination Commission Queensland, Phone 1300 130 670;
- [Queensland Ombudsman](#), Phone (07) 3005 7000;
- Workplace Health and Safety Queensland, Phone: 1300 362 128.

5.8. **Victoria**

- Disability Services Commissioner, Phone 1800 677 342;
- Victorian Equal Opportunity and Human Rights Commission, Phone 1300 292 153;
- Victorian Ombudsman, Phone (03) 9613 6222;
- Work Safe Victoria, Phone 13 23 60.

- 5.9. We recognise that there may be circumstances when people may make Public Interest or Emergency Disclosures, however we commit to always responding to disclosures first made to us, promptly and appropriately.

6. Concerning disclosures made to legal practitioner

- 6.1. If you make a disclosure to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Part 9.4 of the Act (which includes the whistleblower protections and confidentiality of a whistleblower's identity) the disclosure will be protected under the Act.

7. Concerning public interest disclosures

- 7.1. You may make a disclosure in the public interest to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:

- you have previously made a disclosure of that misconduct; and
- at least 90 days have passed since the previous disclosure was made; and
- you do not have reasonable grounds to believe that action is being, or has been, taken to address the misconduct to which the previous disclosure related; and
- you have reasonable grounds to believe that making a further disclosure of the misconduct would be in the public interest; and
- after the end of the 90 day period you give the person to whom you made the previous disclosure a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - states that you intend to make a public interest disclosure; and
 - the public interest disclosure is made to:
 - a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
 - a journalist; and
 - the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the misconduct or the improper state of affairs or circumstances.

8. Concerning emergency disclosures

8.1. You may also make an emergency disclosure to a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist if:

- you previously made a disclosure that qualifies for protection under the Act (Part 9.4 under subsection 1317AA(1)); and
- you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- you give the body to which the previous disclosure was made a written notification that:
 - includes sufficient information to identify the previous disclosure; and
 - state that you intend to make an emergency disclosure; and
 - the emergency disclosure is made to:
 - a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
 - a journalist; and
 - the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the recipient of the substantial and imminent danger.

9. Where can I get information and advice?

9.1. If you need information and advice about making a disclosure or the support and protection available you may discuss the matter in confidence with your immediate supervisor, manager or one of the WPOs. Note: In the event you do not formally make a disclosure we may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

10. Do I have to disclose my identity?

10.1. There is no requirement for a discloser to identify themselves in order for a disclosure to qualify for protection under the Act. A discloser can:

- choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised, and

- refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

10.2. We encourage disclosers who wish to remain anonymous to maintain ongoing two-way communication with us, so Aruma can ask follow-up questions or provide feedback.

11. Will my identity be treated confidentially?

11.1. Your identity will not be disclosed by Your Call or Aruma unless:

- you consent to disclosing your identity;
- the disclosure is required by law;
- it is necessary to prevent a serious threat to a person's health or safety; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

11.2. We have in place the following measures and mechanisms to protect the confidentiality of a discloser's identity and reduce the risk that the discloser will be identified from the information contained in a disclosure:

- Where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- Disclosures will be handled and investigated by qualified staff;
- Secure record-keeping and information-sharing processes;
- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- Communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and

- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.
- 11.3. An unauthorised disclosure of: the identity of a discloser, or information that is likely to lead to the identification of the discloser where the information was obtained because of the disclosure, will be regarded as a disciplinary matter and will be dealt with in accordance with Aruma's disciplinary procedures. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and your identity is revealed without your consent you may also be eligible to claim compensation and remedies under the Act.
- 11.4. As a discloser you should be aware that in practice, people may be able to guess your identity if: you have previously mentioned to other people that you are considering making a disclosure; you are one of a very small number of people with access to the information; or your disclosure relates to information that you have previously been told privately and in confidence.
- 11.5. You can lodge a complaint with us if you believe a breach of your confidentiality as a discloser has occurred by contacting a WPO. You can also lodge a complaint with a regulator if you believe a breach of your confidentiality as a discloser has occurred.

12. Protection against detrimental conduct

12.1. We will do everything reasonably possible to support and protect anyone who:

- intends to or actually makes a disclosure;
- is mentioned in the disclosure;
- acts as a witness ; and
- otherwise assists with the investigation and resolution of the disclosure

from detrimental conduct, acts and omissions.

12.2. Examples of detrimental conduct, acts and omissions include but are not limited to:

- dismissal of an employee;
- alteration of an employee's position or duties to his or her disadvantage;
- harassment or intimidation of a person;

- harm or injury to a person, including psychological harm; and
- damage to a person's reputation.

12.3. Examples of actions that are not detrimental conduct and omissions include but are not limited to:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and
- managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

12.4. Aruma has in place the following measures and mechanisms to protect disclosers from detriment:

- Support services (including counselling or other professional or legal services) that are available to disclosers;
- Strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- Actions for protecting a discloser from risk of detriment—for example, we may allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;
- Processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser;
- Procedures on how a discloser can lodge a complaint if they have suffered detriment, and the actions we may take in response to such complaints (e.g. the complaint may be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the board or audit or risk committee); and

- Interventions for protecting a discloser if detriment has already occurred— for example, we may investigate and address the detrimental conduct, such as by taking disciplinary action, or we may allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.
- 12.5. We will thoroughly investigate reports of detrimental acts. If proven, those who have victimised another will be subject to management action including disciplinary action up to dismissal. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a discloser of a reportable matter and you suffer detrimental acts, you may also be eligible to claim compensation and remedies under the Act. Nothing in this policy is intended to change or take away any other protections which may be available at law.

13. Assessing and Controlling the risk of detriment

- 13.1. Aruma has established processes for assessing and controlling the risk of detriment and keeps records of its risk assessments and risk control plans.

Steps in Aruma's framework for assessing and controlling the risk of detriment

- Risk identification: We assess whether anyone may have a motive to cause detriment.
- Risk analysis and evaluation: We analyse and evaluate the likelihood of each risk and evaluate the severity of the consequences.
- Risk control: We develop and implement strategies to prevent or contain the risks—for anonymous disclosures, we assess whether the discloser's identity can be readily identified or may become apparent during an investigation.
- Risk monitoring: We monitor and reassess the risk of detriment where required—the risk of detriment may increase or change as an investigation progresses, and even after an investigation is finalised.

14. Support and Protection

- 14.1. If necessary Aruma will appoint a WPC to arrange or coordinate support and protection for anyone who has or is in the process of making a disclosure.
- 14.2. The discloser can contact a WPO to discuss how a WPC may be able to provide support and protection.

15. What will Aruma do with the disclosure?

15.1. The WPO has been appointed by Aruma to receive the disclosure directly from you (if you make an internal disclosure to our organisation) or from Your Call (if you make an external disclosure to Your Call).

16. Investigation of the disclosure

16.1. The WPO will carefully assess and use the information provided in the disclosure to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including:

- the nature and scope of the investigation;
- who will conduct the investigation and whether that person should be external to our organisation;
- the nature of any technical, financial or legal advice that may be required; and
- a timeframe for the investigation (having regard to the level of risk).

17. How will the investigation be conducted?

17.1. The investigation will be conducted in a constructive, impartial and lawful way according to the principles of natural justice and procedural fairness and all efforts will be made to meet investigation best practices.

17.2. The Investigator will:

- gather information, material and documentation concerning the disclosure as quickly as possible. (This may involve taking steps to protect or preserve documents, materials and equipment);
- focus on the substance of the disclosure and will not focus on the motives of the discloser;
- not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser are somehow less serious. The discloser's experience may indicate a larger or systemic issue;
- take a statement or record of interview and or tape formal interviews with witnesses as required (Where the discloser wishes to remain anonymous and does not wish to make a statement they will not be asked to do so.);
- keep information gathered in the investigation securely;

- take all reasonable steps to protect the identity of the discloser. Where disclosure of the identity of the discloser cannot be avoided due to the nature of the allegations, the investigator will first gain the consent of the discloser before providing identifying information to any additional persons; and
- complete the investigation and provide a report of their findings as soon as is reasonably practical.

18. Investigator's Report

18.1. At the conclusion of the investigation, the investigator will provide a written report to the WPO including:

- a finding of all relevant facts;
- whether the disclosure is proven, not proven or otherwise; and
- recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings.

18.2. Aruma will use the report to determine the action (if any) to be taken, including disciplinary action.

18.3. The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

19. Will the discloser be kept informed?

19.1. Subject to privacy and confidentiality requirements the discloser will be kept informed of:

- when the investigation process has begun;
- relevant progress of the investigation; and
- the outcome of the investigation

to the extent that it is legally permissible and appropriate to do so.

20. What happens if the misconduct is proven?

20.1. If the misconduct is proven, Aruma will decide what action to take including disciplinary action up to dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

21. Avenues for Review

- 21.1. A discloser may request a review of the investigation findings if the discloser is not satisfied with the outcome. The review will be conducted by an officer who is not involved in handling and investigating disclosures and the review findings will be shared with the board or audit or risk committee.
- 21.2. Aruma is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

22. What immunities are available to a discloser?

- 22.1. We want you to speak up against misconduct. Anyone who makes a disclosure:
- with reasonable grounds for suspecting misconduct has or may occur; and
 - has not engaged in serious misconduct or illegal conduct relating to the disclosure will be provided with immunity from disciplinary action.
- 22.2. If you make a disclosure that qualifies for protection under the Act:
- you are not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure; and
 - no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against you on the basis of the disclosure; and
 - the information is not admissible in evidence against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Note: Except as provided for by the Act, it does not prevent a whistleblower being subject to any civil, criminal or administrative liability for conduct of the whistleblower that is revealed by the disclosure.

23. What are the consequences of making a false disclosure?

- 23.1. Anyone who makes a disclosure knowing it to be false or misleading may be subject to disciplinary action, including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.

23.2. Aruma however does not wish to deter staff from making disclosures. In cases where disclosers have some information leading to a suspicion, but not all the details, staff are encouraged to speak up and report the misconduct and will not face disciplinary action in those circumstances.

24. How will this policy be made available to officers and employees of our organisation?

24.1. Aruma makes the policy available to employees and officers by:

- posting the policy on the staff intranet or other communication platform; and
- incorporating the policy in employee induction information packs and training for new starters.

25. Training & Education

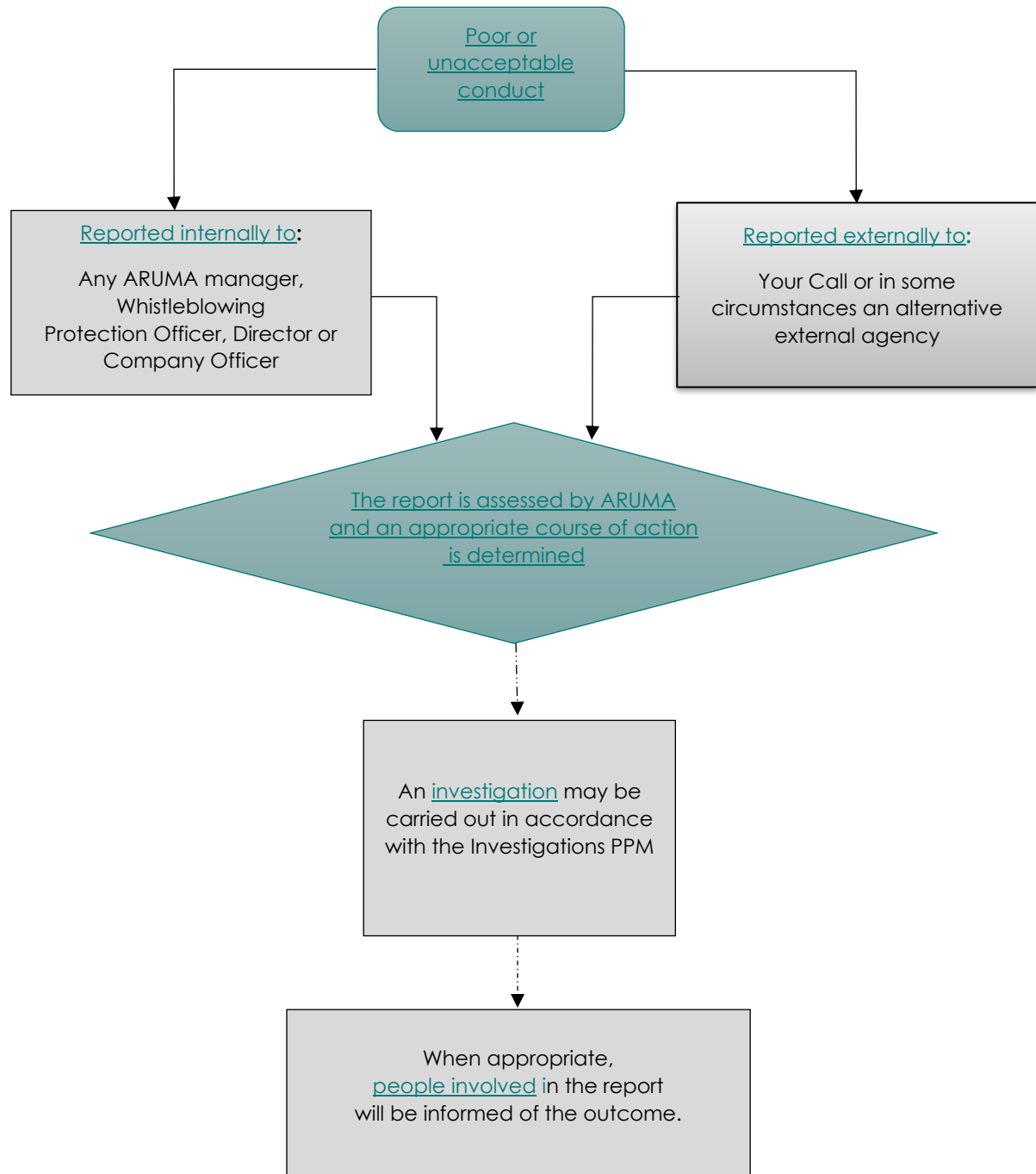
25.1. The CEO will be responsible for ensuring that upfront and ongoing education and training on the whistleblower policy and procedures is conducted for all staff.

26. Review of this Policy

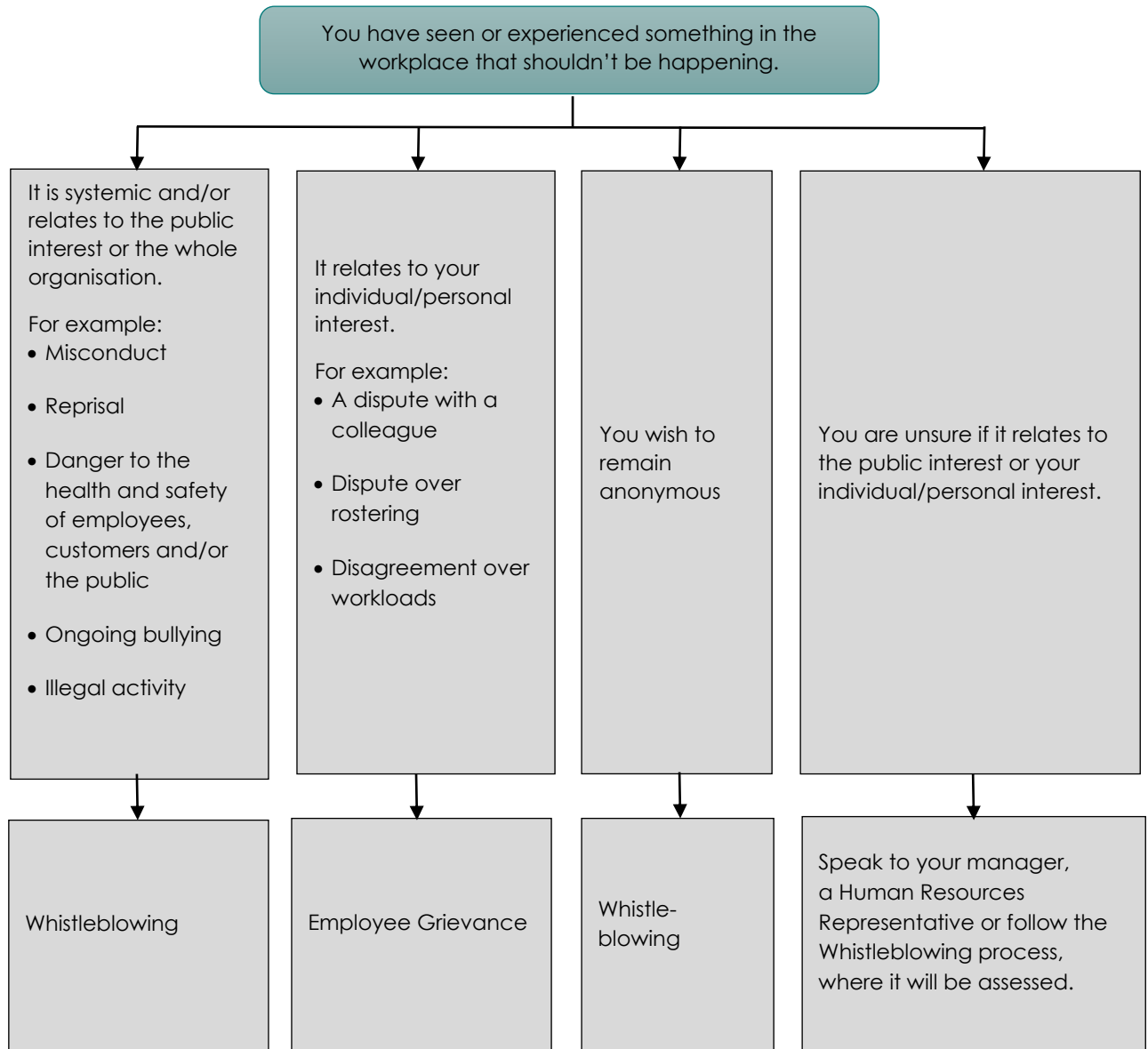
26.1. The General Counsel will monitor and review this policy and associated processes and procedures (annually/other) to ensure it meets its objectives.

25.2 Any amendments to this policy shall be made known to employees and officers of our organisation by posting an updated version of the policy on the Aruma intranet and website and providing training when necessary.

27. Flowchart: Whistleblowing at Aruma



28. Flowchart: Whistleblowing versus Employee Grievance process



Relevant Resources

29. Legislation, external requirements and oversight bodies

National

[AS 8004-2003 Australian Standard on Whistleblower Protection Programs for Entities](#)
 Australian Securities and Investments Commission
 'Regulatory Guide 270, [Whistleblower Policies](#)', 2019
 Banking Act 1959
 Corporations Act 2001
 Insurance Act 1973
 Life Insurance Act 1995
[National Standards for Disability Services](#)
[NDIS Legislation, Rules and Policies](#)

Superannuation Industry (Supervision) Act 1993
 Taxation Administration Act 1953
 Treasury Laws Amendment Act (Enhancing Whistleblower Protections)(2019)

New South Wales

The Public Interests Disclosure Act 1994 (NSW)

Victoria

Protected Disclosure Act 2012 (VIC)

30. QMS policies, procedures and/or forms

[Code of Conduct](#)
[Complaints and Feedback Policy](#)
[Complaints and Feedback Procedure](#)
[Discipline Policy](#)
[Employee Assistance Programme Policy](#)
[Employee Grievance Policy and Practice Manual](#)
[Whistleblowing Policy](#)

Easy English Documents

[Easy English Whistleblowing Policy](#)
[Easy English Complaints and Feedback Policy](#)

31. External resources to enhance practice

The [National Disability Insurance Agency](#),
 1800 800 110
 The [Complaints Resolution and Referral Service](#),
 Phone: **1800 880 052**;
 The police;
 The [National Disability Abuse and Neglect Hotline](#):
 1800 880 052.

Australian Capital Territory

[ACT Human Rights Commission](#),
 Phone: (02) 6205 2222;
[Public Advocate of the ACT](#),
 Phone: (02) 6207 0707;
[WorkSafe ACT](#),
 Phone: (02) 6207 3000.

New South Wales

[Anti-Discrimination Board of New South Wales](#),
 Phone (02) 9268 5544;
[Ombudsman New South Wales](#),
 Phone (02) 9286 1000;
[Safe work NSW](#),
 Phone: 13 10 50.
[Workplace Health and Safety Queensland](#),
 Phone: 1300 362 128.

Queensland

[Antidiscrimination Commission Queensland](#),
 Phone 1300 130 670;
[Queensland Ombudsman](#),
 Phone (07) 3005 7000
[Workplace Health and Safety Queensland](#), Phone:
 1300 362 128.

Victoria

[Disability Services Commissioner](#),
 Phone 1800 677 342
 Victorian [Equal Opportunity and Human Rights Commission](#),
 Phone 1300 292 153
[Victorian Ombudsman](#),
 Phone (03) 9613 6222
[Work Safe Victoria](#),
 Phone 13 23 60.

Your Call Whistleblowing Service

<https://secured1.yourcall.com.au/>;
Live chat: www.whistleblowing.com.au/contact
Email: info@yourcall.com.au
 National Relay Service www.relayservice.gov.au
www.relayservice.gov.au
[Public Interest or Emergency Disclosures](#)