

# Whistleblowers Policy & Procedure

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**PURPOSE:** This policy encourages staff, clients or anyone who has an interest in Our House, to report an issue if they genuinely believe someone has engaged in serious wrongdoing.

Our House is committed to the protection of individuals who disclose information about illegal or improper conduct occurring within Our House. This policy has been adopted to provide a safe and confidential environment where such concerns can be raised by whistleblowers without fear of reprisal or detrimental treatment.

Outline how Our House will deal with all reports of serious wrongdoing; and sets out the avenues available to report serious wrongdoing to Our House. Whilst it is generally expected that these issues will be raised through the normal channels of management, reporting by these avenues may be appropriate or necessary in certain situations.

## 1. WHO IS ENTITLED TO PROTECTION

**1.1** To be treated as a whistleblower under this policy the person must:

- a) Be one of the individuals set out in section 1.2.
- b) Disclose information regarding the type of matters set out in section 1.3. and
- c) Disclose that information to one of the persons or bodies set out in section 1.4.

**1.2 Disclosures can be made by a current or former:**

- a) Director or employee of Our House.
- b) Contractor or supplier of goods and services to Our House, or their current and former employees.
- c) A Relative, Spouse or a dependant of an individual mentioned above.
- d) Clients of Our House.

**1.3** Disclosures can be made about unlawful conduct or conduct that endangers the public or financial system which the whistle blower suspects, on reasonable grounds has occurred, or is occurring within Our House. Including conduct by a Director or an employee of Our House. However, disclosures which are solely about a Personal Work-Related Grievance (as defined) will not be protected under this policy. Such matters may be appropriately dealt with by the Our House Operations Manager and the General Manager.

**1.4** A whistleblower may make a disclosure to the following people or bodies:

- a) Your supervisor or manager (if you are an employee of Our House);
- b) A Director of Our House;
- c) An auditor of Our House;
- d) ACNC and ASIC
- e) A lawyer in order to obtain advice on the matter.

## **2. MAKING A DISCLOSURE**

A disclosure can be made in person, by telephone or in writing to one of the people or bodies identified in 1.4 above. The external persons and bodies in sections 1.4 above, may have other means by which you may make a disclosure. It is important to note that a whistleblower does not have to reveal their identity when making a disclosure.

## **3. HOW OUR HOUSE INVESTIGATES DISCLOSURES**

**3.1** The person who receives the disclosure pursuant to section 1.4 a) or b) will promptly forward it to the Chair of the Our House Board who will determine whether it requires formal investigation. All other disclosures will be investigated according to the procedures and policies adopted by the relevant body to whom disclosure was made.

**3.2** Any formal investigation of a disclosure will be undertaken by an impartial senior person, or an external investigator.

**3.3** Our House will ensure that the investigation:

- a) Is conducted promptly.
- b) Is sufficiently resourced.
- c) Is conducted in a fair and objective manner.
- d) Is conducted in strict confidence.
- e) Protects the identity of the person who made the disclosure; and
- f) Gives the opportunity to any person who is adversely mentioned in the disclosure an opportunity to respond prior to any findings being made.

**3.4** At the conclusion of the investigation, the investigator will provide the Chair of the Our House Board with a report that will summarise how the investigation was conducted, the evidence collected and contain findings in relation to the allegations in the disclosure and recommend any action required.

**3.5** Following receipt of the investigation report, the Chair will take appropriate action, which may include:

- a) implementing the recommendations of the investigator.
- b) requesting further investigation.
- c) recommending disciplinary action; and/or
- d) notifying regulatory or law enforcement bodies.

**3.6** The whistleblower will be informed of the results of the investigation following the Chair taking the steps in 3.5 above. However, some circumstances may limit the information provided to the person, such as confidentiality or other legal constraints.

## **4. PROTECTION FOR WHISTLEBLOWERS**

**4.1** A whistleblower is entitled to protection of their identity, or information that is likely to lead to their identity becoming known. The whistleblower's identity or information that is likely to lead to their identity becoming known, can only be disclosed where it is made to:

- a) an in house or external lawyer for the purposes of obtaining legal advice or legal representation.
- b) A Commonwealth, State or Territory Authority for the purposes of assisting them in the performance of their duties.
- c) The Australian Federal Police; or
- d) A Court or Tribunal, in circumstances where it is considered necessary in the interests of justice, or is otherwise made with the consent of the whistleblower.

A whistleblower's identity may be disclosed to others as part of the investigation process, but only if necessary and Our House will take all reasonable steps to avoid the identification of the whistleblower.

#### **4.2 Other protections provided to whistleblowers are:**

- a) Our House will not cause any detriment to the whistleblower because of the disclosure.
- b) Anyone who causes or threatens to cause detriment to a whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence under the Corporations Act and may be liable for damages.
- c) The whistleblower has immunity from any civil, criminal, or administrative legal action (including disciplinary action) as a result of making the disclosure; and
- d) No contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the disclosure.

#### **5. LEGISLATION**

This policy is governed by the Corporations Act 2001 (Cth)

**Date ratified by Our House Board: July 2025**

**This Policy will be reviewed annually**