

# POLICY 2.10

## WHISTLEBLOWER POLICY



### POLICY STATEMENT

The Reach Foundation conducts its business with the highest standards of integrity and honesty. We expect everyone to maintain the same standards. We therefore encourage an open culture in our dealings between our managers, employees and all people with whom we engage in the course of our business.

Reach People are encouraged to report any wrongdoing at or related to Reach that falls short of our business principles. However, we recognise that our people may not always feel comfortable about discussing their concerns internally — especially if they believe Reach is responsible for the wrongdoing.

The aim of this Policy is to ensure that Reach People:

- feel confident that they can raise any matter that concerns them;
- know that if they do, it will be taken seriously and treated as confidential; and
- know that no action will be taken against them as a result.

Reach people are encouraged to use the procedure set out below if they have any concerns at all about wrongdoing at work — including: any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

DOCUMENT CONTROL			
Policy Owner:	Officer Manager	Next Review Date:	3 years
Approver:	Risk and Audit Committee	Version No:	
Date approved:	24 February 2014	Version approved:	

### RELATED DOCUMENTATION

- Reach Code of Conduct
- Complaints and Grievances Policy

### DEFINITIONS

Reach People – any member of Reach staff, crew, facilitators, volunteers, supporters and/or contractors

### OPERATING PRINCIPLES

#### SUBJECT MATTER OF DISCLOSURES

Reach people are encouraged to disclose any matter concerning the conduct of Reach business which leads them to believe that malpractice is occurring, may occur, or has occurred. In particular, they should disclose the occurrence or likely occurrence of any of the following:

- The commission of a criminal offence;
- Any failure to comply with a legal obligation or regulatory requirement applicable to the business;
- Any risk to health and safety;
- Any damage to the environment; and
- The concealment of information that reveals any of the above matters.

## PROCEDURE

### Who

Normally, Reach people should raise their concerns with their Line Manager. However, if the activity they wish to report involves their Line Manager, or they think that it is inappropriate to disclose the information directly to their Line Manager for any reason, then they should raise their concerns with the CEO.

If they would like to raise their concern externally then the contacts are:

- Reach HR Manager, Miranda Sowden
- Kevin Keenan, Reach Non Executive Director, Company Secretary

Contact should be made via the Reach switchboard (03 9412 0900) and the relevant person will call them back. The caller does not need to disclose why they are calling or provide any details of their concerns.

### Confidential

Any disclosure under this procedure will be treated as completely confidential and will not result in any report to anyone within our organisation unless they agree to the contrary or it is required by law.

### Anonymous

Reach people may raise any concerns under the procedure anonymously, in writing, to the appropriate person. However, if they remain anonymous, then this may hamper our ability to investigate the concerns.

### Investigation

Reach will try to investigate the matter raised as soon as is reasonably practicable. The person raising the concerns will normally be contacted to confirm that this investigation is taking place. They may be requested to put their concerns in writing or to attend as a witness during any stage of the investigation. If the person is requested to attend, then they will normally be permitted to be accompanied by an appropriate support person.

Once a concern is raised and warrants investigation, it may not be able to be stopped if Reach thinks it needs to be progressed. Reach will handle the matter as sensitively as possible during the course of the investigations.

### Outcome

If possible, the person raising the issue will be informed of the outcome of the investigation and of any action that is proposed to rectify any established malpractice.

### Dissatisfied

If the person raising the issue is unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, then they should confirm their concerns in writing.

### Protecting you

If the person raising the issue believes they are being subjected to a detriment by any person within our organisation as a result of raising concerns under this procedure, then they must immediately inform their Line Manager or the CEO. Reach will then take appropriate action.

### External authorities

There may be matters that cannot be dealt with internally. In that case, external authorities will need to become involved. If this is necessary, then we reserve the right to involve them without consent. We will not disclose the person raising the concern as the source of the information — unless they agree otherwise, or if the external authorities such as the police compel us to disclose the source of the complaint. Reach will try to mitigate this where possible but cannot guarantee it.



### **Good faith**

If Reach has good reason to believe that when the person invoked this procedure, they did not do so in good faith (for example, for malicious reasons or to pursue a personal grudge against another employee) then this will constitute misconduct and may result in disciplinary action.