

Whistleblower

Purpose

Bridge Housing Limited (BHL) is committed to establishing and maintaining a culture of good governance and corporate compliance. This includes the ability for people within and outside of the organisation to be able to come forward with complaints of fraud, corruption or general misconduct (“reportable conduct”) and not fear retribution.

A Whistleblower Policy is therefore an important element in detecting fraudulent, illegal or other undesirable conduct. The policy is designed to:

- encourage and facilitate disclosure of such conduct;
- provide anonymity for staff that make these disclosures;
- provide protection for staff who may fear or suffer reprisals in relation to such disclosures; and
- Ensure that the matters disclosed are properly investigated and dealt with.

Policy

Our whistleblower policy aims to:

- encourage people within and outside the organisation to come forward and raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal or feeling threatened by doing so;
- outline how Bridge Housing will deal with all reported misconduct or unethical behaviour; and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.

Our whistleblower program is based on Australian Standard “Whistleblower Protection Programs for Entities” AS 8004:2003.

If you wish to make a disclosure, prior to taking action, whether anonymously or not, please read this policy.

Definitions

What is a Whistleblower?

A whistleblower is a person who in good faith reports improper conduct through appropriate channels. This conduct may include dishonest, illegal, unethical conduct, a breach of Commonwealth or State legislation, and/or actual or suspected fraud.

Australian Standard 8004–2003 defines a whistleblower as:

A person being a director, manager, employee or contractor of an entity who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with reportable conduct and where the whistleblower wishes to avail themselves of protection against reprisal for having made the report. A whistleblower may or may not wish to remain anonymous.

What is reportable conduct?

Reportable conduct is defined in Australian Standard AS8004-2003: Whistleblower Protection Programs for Entities, as:

- Conduct by a person or persons connected with an entity which, in the view of whistleblower acting in good faith, is:
 - Dishonest;
 - Fraudulent;
 - Corrupt;
 - Illegal including theft, drug sale/use, violence or threatened violence and criminal damage against property;
 - In breach of Commonwealth or state legislation or local authority by-laws;
 - Unethical;
 - Other serious improper conduct;
 - An unsafe work-practice; or
 - Any other conduct which may cause financial or non-financial loss to the entity or be otherwise detrimental to the interests of the entity

BHL Whistleblower Procedure

Bridge Housing Limited will ensure that all staff are aware of and can access this procedure through the processes outlined below.

BHL gives an undertaking to all whistleblowers that we do not intend to take action against a whistleblower for reporting, and clearly state that all reports will be kept confidential and secure.

A whistleblower who reports, or seeks to make a report, will be given a guarantee of anonymity if this is desired by the whistleblower. This provision is subject to circumstances in which the law requires the disclosure of the identity of the whistleblower in legal proceedings.

Any person who reports reportable conduct as defined by this procedure will not be personally disadvantaged for having made the report by:

- dismissal,
- demotion,
- any form of harassment;
- discrimination; or
- Current or future bias.

What the Whistleblower Policy seeks to do

The main objectives of a Whistleblower Policy are to:

- Encourage the reporting of matters that may cause financial or non financial loss to BHL or damage to BHL's reputation;
- Protect employees who report (anonymously or not) actual or suspected fraudulent activity; and
- Assist BHL develop a positive internal culture to encourage disclosure by protecting the identity of reporters.

To do this we will establish a number of measures in conjunction with our fraud control strategies. These will include staff training on BHL's Fraud Control and Whistleblower Policies, delineation of the role and responsibilities of the Whistleblower Protection Officer, and how employees can access the Whistleblower Policy.

How and when does a whistleblower make a report

WEBSITE 24/7:

www.your-call.com.au or www.whistleblowing.com.au

Simply log on by the internet and click on "Click here to make a Secure Report" button on the right hand side of the home screen. This will direct you to <https://www.whistleblowing.com.au/report>. Follow the prompts and enter Bridge Housing's unique identifier code BRID2009. You will be asked to supply information on an electronic form which is entirely between you and Your-Call. You will have the ability to upload documentation and/or other evidence that you may have to support your report.

A disclosure identifier number (D.I.N) will be generated and you will be asked to enter a password of your choosing to allow you, if you wish (optional), to later use Your-Call's web based Message Board system.

The Message Board

https://www.whistleblowing.com.au/report/message_board/ will allow you to post questions receive responses and answer questions Your-Call may have posted that it has received from Bridge Housing to have you answer if you are able to. You can continue to remain anonymous in the use of the Message Board.

The website is monitored 24/7, 365 days of the year.

TELEPHONE:

Ring 1300 798 101 between the hours of 7am to 10pm Monday to Friday (AEST excluding national public holidays)

Your-Call does NOT have telephone number identification for either inbound or outbound telephone calls.

Your-Call will provide you with a disclosure identifier number (D.I.N) and a security password for the purposes of any further telephone contact and/or the use of Your-Call's web based Message Board system.

Any disclosure you make (whether through the website or by telephone) will be reviewed by Your-Call Disclosure Management Services (D.M.S) and a report will be provided to Bridge Housing.

Whistleblower protection officer

We have an appointed Whistleblower Protection Officer, and this position is currently held by the General Manager Finance and Corporate Services. They can be contacted by emailing d.miller@bridgehousing.org.au or calling 02 8324 0820. If you wish to contact The Whistle Blower Protection Officer anonymously, that can be done through Your-Call as described in the section above.

Should the allegation be about the General Manager Finance and Corporate Services or the CEO the Chairperson will be the point of contact and take on the responsibilities of the Whistle Blower Protection Officer.

The role of the Whistleblower Protection Officer is to safeguard the interests of the whistleblower in accordance with this guide. They have direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the Chairperson, CEO, senior executive and Board, as may be required.

The Whistleblower Protection Officer is responsible for receiving and investigating the substance of any reports. On the basis of sufficient evidence in support of matters raised in a report, the Whistleblower Protection Officer determines whether to refer reports for further action, or refute these where necessary. The Whistleblower Protection Officer is to ensure that the whistleblower is kept informed of the outcomes of the investigation of his/her report, subject to the considerations of privacy of those against whom the allegations are made.

Investigating report

All reports of the conduct outlined above will be investigated to determine whether there is sufficient evidence to substantiate or refute the allegation by a whistleblower. The investigation will be conducted by the Whistleblower Protection Officer or by direction of our Chairperson or other person decided by the Board or CEO, depending on the particular circumstances and allegations.

The investigation will not be conducted by a person who may be the subject of the investigation or has inappropriate links or connections (actual or perceived) to the person(s) or practice(s) under investigation.

All investigations should be fair, independent and in accordance with best practice. The investigation process should be accountable and open to review. An audit trail should be maintained and critical findings and decisions made during the course of investigations should be documented.

Responsibility to act in good faith

Whistleblowing is about reporting real or perceived malpractice. If a report is not made in good faith, or is found to be malicious, deliberately misleading or frivolous the person making the report may be subject to disciplinary action.

Accessing the Whistleblower Policy

If you are reading this you have accessed the Whistleblower Policy This document will be made available to all employees through:

- BHL's website and intranet;
- request from Management;
- request from the Fraud Control Officer (General Manager Finance and Corporate Services);
- the induction pack for all new employees; and
- a link to an electronic copy of the policy will be emailed to all current employees.

Training

Bridge Housing Limited will provide training on the Whistleblower Policy to all new employees through the induction period and current employees throughout the period of their employment with BHL

