

1. Summary:

This Policy aims to:

- a) encourage disclosures of wrongdoings (including misconduct, dishonest and illegal conduct) in good faith if they know or have reasonable grounds to suspect such conduct
- b) help deter wrongdoings in accordance with AQA’s risk management and governance framework
- c) ensure people who make disclosures of wrongdoings can do so safely, securely and with confidence that they will be protected and supported
- d) to provide transparency on AQA’s framework for receiving, handling and investigating disclosures
- e) to support AQA’s values and Code of Conduct and to ensure AQA meets legal and regulatory obligations

2. Scope:

This policy applies to:

Employees	Directors	Officers	Contractors (including employees of contractors)	Volunteers	Suppliers	Consultants
✓	✓	✓	✓	✓	✓	✓

Within this policy all of these people are represented by the term “Workers”.

Although they are under no obligation to do so, any associate, family member or dependant of any person in the above groups of people may also make a disclosure. All eligible disclosures will be treated in accordance with the relevant rights and protections under this Policy.

3. Policy:

AQA is committed to fostering a culture of legal, ethical and moral behaviour and exemplary corporate governance.

AQA recognises the value of transparency and accountability in its administrative and management practices, and supports the reporting of improper conduct.

This Whistleblower Policy has been developed so that people can raise concerns regarding situations where they believe that AQA or anybody connected with AQA has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct, as set out below.

4. Principles:

Higher standard – This Policy is designed to comply with AQA’s legal obligations. If anything in this Policy is inconsistent with any law imposed on AQA, that legal obligation or the “higher standard” will prevail over this Policy.

Speak up and report it! – We encourage Workers at AQA to report any concerns in line with our policies and procedures.

Our expectations of Workers – AQA expects Workers to act honestly and ethically, and to make any report on reasonable grounds.

Our responsibility to Whistleblowers – Our obligations to Workers are spelled out in this policy, but in particular in the section titled ‘Protection’.

Confidentiality and consent - AQA will maintain confidentiality of all reports and protect the identity of reporters to the fullest extent possible. While AQA encourages Whistleblowers to identify yourself to a Whistleblowing Protection Officer or Executive Manager, People & Culture you may opt to report your concerns anonymously.

5. Reportable Conduct:

Who can make a report?

A Whistleblower is a person who discloses (or intends to disclose) reportable conduct (including misconduct, dishonest and illegal activities) that has occurred in connection with AQA.

Whistleblowers can include:

- employees of AQA (current, former, contractors, volunteers)
- suppliers of goods and services
- a relative, dependant or dependent of the spouse of any person referred above

What is Reportable Conduct?

“Reportable Conduct” includes any suspected or actual wrongdoings which are:

- misconduct (including fraud, bribery, theft, negligence, breach of trust, breach of duty)
- an improper state of affairs/circumstances in relation to AQA or a related body corporate.

What is *not* Reportable Conduct?

While everybody is encouraged to speak up and report any suspected wrongdoings to AQA, not all types of conduct are intended to be covered by this Policy or by the protections under the *Corporations Act 2001* (Cth). This Policy does not apply to complaints by clients/users about an AQA service or activity or personal work-related grievances (see below), unless the grievance includes victimisation due to whistleblowing. Complaints about services and other matters are dealt with under other policies.

False reports or disclosures

Protected Disclosures must be made on reasonable grounds. Anyone who knowingly makes a false report/disclosure of Reportable Conduct may be subject to disciplinary action, including dismissal.

What is a Protected Disclosure

When a Whistleblower discloses Reportable Conduct to AQA this is called a Protected Disclosure.

Protections Available for Whistleblowers

Disclosures from Whistleblowers will be treated confidentially and sensitively. Once a disclosure is received by AQA from a Whistleblower, immediate steps will be taken to protect the identity of the Whistleblower and ensure document security.

For further information see the Whistleblower Procedure.

How will AQA investigate disclosures

When a Whistleblower discloses Reportable Conduct, AQA will investigate the allegations as soon as practicable. Investigations will be conducted promptly and fairly. AQA recognises the importance of balancing the rights of the Whistleblower and the rights of the people against whom a disclosure is made.

For further information see the Whistleblower Procedure

6. Monitoring and Assurance:

This Policy will be available to all Workers via the AQA Policy and Procedure manual and website

To ensure effective protection under the Policy, the Business Leadership Team will monitor and review this Policy annually.

7. Related Legislation:

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)
- Insurance Act 1973
- Life Insurance Act 1995
- Public Interest Disclosure Act 2013
- Superannuation Industry (Supervision) Act 1993
- Taxation Administration Act 1953

This policy & procedure is not intended to override any industrial instrument, contract, award or legislation.

8. Internal Documents:

Whistleblower Procedure

9. Policy Administration:

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