

**Employee Protection (Whistleblowing)
Policy**

Purpose / Policy	This purpose of this policy is to protect an individual making a complaint against senior management or Board members of Good Samaritan Industries (GSI).
Standards Referenced	Std 1 KPI's 1.4, 1.5, 1.6, and 1.7; Std 2 KPI's 2.1, 2.2, 2.3, 2.4, 2.5 and 2.6; Std 3 KPI's 3.2, 3.3, 3.4 and 3.5; Std 4 KPI's 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6; Std 5 KPI's 5.1, 5.2, 5.3, 5.4, 5.5, 5.6 and 5.7; Std 6 KPI's 6.1, 6.2, 6.3, 6.4, 6.5, 6.6 and 6.7

1.	Commitment	Resp.
	GSI is committed to the highest standards of conduct and ethical behaviour at all levels of the organisation. Additionally, we are committed to adhering to all laws and regulations that apply to GSI.	All
2.	Definition	
	<p>For the purpose of this policy, “whistleblowing” is defined as the deliberate, voluntary disclosure by an individual or employee, about an actual, suspected or anticipated wrongdoing or activity of GSI, its Directors or its management that could be contrary to law or which could put GSI at risk, such as:</p> <ul style="list-style-type: none"> • Dishonest, fraudulent or corrupt behaviour • Illegal activity • Unethical behaviour (i.e. in breach of GSI’s Code of Conduct or generally) • Other serious improper conduct • Any other conduct which may cause financial or non-financial loss to GSI or be otherwise detrimental to the interests of GSI. 	All
3.	Key Principles	
	<p>The support of employees is necessary to achieving compliance with various laws and regulations. GSI recognises that it may be difficult for an individual or employee to make a “whistleblower” report using our Complaints Policy (CON:03). Therefore, we have established a separate process to encourage and facilitate such reporting.</p> <p>If an employee has a reasonable belief that a senior manager or Board member of GSI is involved in a practice that is in violation of the law, or clearly against GSI policy, the employee has an obligation to bring this to GSI’s attention. They can report any allegations, in writing, to the Whistleblower Protection Officer (WPO) whose details are as follows:</p> <p>Divisional Manager Human Resources Phone: 08 9463 0557 Email: hr@gsi.org.au Post: 33-35 Bannister Road, Canning Vale WA 6155</p> <p>The WPO will take all reasonable steps to protect the identity of the individual or whistleblower making the complaint. Maintaining confidentiality is crucial in ensuring reprisals are not made against an individual making a complaint against senior management or Board member. GSI will not retaliate against the employee.</p>	

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3.	<p>Key Principles</p> <p>The whistleblower who brings the alleged unlawful, unethical or other improper activity, policy or practice to the attention of the WPO must afford GSI with a reasonable opportunity to investigate and correct the alleged unlawful/wrongful activity.</p> <p>Allegations against senior management or Board will be handled as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Complaint Against:</th> <th style="width: 60%;">Complaint Sent To / Managed By:</th> </tr> </thead> <tbody> <tr> <td>Divisional Manager</td> <td>CEO</td> </tr> <tr> <td>CEO</td> <td>Board</td> </tr> <tr> <td>Board Member</td> <td>Chairperson with support from CEO</td> </tr> <tr> <td>Board Chairperson</td> <td>Deputy Chairperson with support from CEO</td> </tr> </tbody> </table> <p>Those managing such a complaint have the right to utilise an independent investigator from the State Government Panel Contract for Human Resource Investigations.</p>	Complaint Against:	Complaint Sent To / Managed By:	Divisional Manager	CEO	CEO	Board	Board Member	Chairperson with support from CEO	Board Chairperson	Deputy Chairperson with support from CEO	All
Complaint Against:	Complaint Sent To / Managed By:											
Divisional Manager	CEO											
CEO	Board											
Board Member	Chairperson with support from CEO											
Board Chairperson	Deputy Chairperson with support from CEO											
4.	<p>Respondents to a Whistleblower Complaint</p> <p>A senior manager or Board member who has a complaint made against them have rights and responsibilities in relation to the process. Throughout the investigation, respondents will be treated fairly and will be afforded natural justice. In addition to this, the following shall apply to respondents and they:</p> <ul style="list-style-type: none"> • Will be informed of the allegations in the complaint and be given the right to respond; • Will be treated as innocent until proven guilty; • Shall not be victimised for being the subject of a complaint and any person found to be engaging in such behavior will be subject to disciplinary action; • May have a support person present at investigation interviews; and • May have an interpreter present at an investigation interview if required. 											
5.	<p>False Reporting / Vexatious Complaints</p> <p>In some circumstances, following the conduct of an investigation, GSI may form the view that the complaint is a false report or vexatious. This assessment will be made on the basis of all of the evidence before GSI at the time of the investigation. If the complaint is determined to be vexatious, the complaint may be dismissed and no further action taken.</p> <p>Refer to CON:03 Complaints for further information regarding vexatious complaints.</p>											
6.	<p>Confidentiality</p> <p>Everyone involved in the complaints process is required to maintain strict confidentiality both throughout the process and once the matter is finalised. This means you cannot discuss any information you provide to GSI during the course of the investigation, nor can you pass on anything you learn from the investigation.</p> <p>These obligations of confidence apply save in circumstances where an individual seeks independent advice on a matter and in the process of seeking that advice, must divulge the confidential information aforementioned.</p> <p>Any breach of confidentiality by anyone involved in a workplace investigation may result in disciplinary action.</p>											




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No: GOV:08

Date: 21/02/2017

Revision No:
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7.	Feedback	
	The whistleblower will be advised when the investigation process has concluded. Where appropriate, feedback will be provided to the whistleblower regarding the outcome.	

Authorised:.....

Board Chair