

## STATEMENT:

Proveda is committed to achieving our corporate objectives in accordance with our Vision and Values, the Proveda Code of Conduct and applicable laws. We want to be measured by the quality of our actions, and build trust by demonstrating honesty, authenticity and responsible decision making.

As part of this commitment Proveda takes unethical, illegal or otherwise improper conduct involving our people and the provision of our services seriously.

Integrity is essential to maintain the trust placed in us by our customers and other stakeholders, and to protect the sustainability of our reputation and our ability to continue having a positive impact for the long term.

1. Proveda has a long-standing reputation for conducting business ethically and honestly and is committed to the highest standards of personal, professional and business behaviour.
2. Proveda encourages people to speak up if they have reasonable grounds to be concerned about unethical, illegal or otherwise improper conduct and that they can do so safely, securely and with confidence that they will be protected and supported.

## Purpose:

- The purpose of this policy is to encourage and empower all Officers, Employees, Students, Volunteers and other external stakeholders of Proveda to report suspected or actual Disclosable Matters without fear of retaliation, victimisation or disadvantage. They may report anonymously if they wish.
- The policy will provide transparency around the framework for receiving, handling and investigating disclosures and meet Proveda's legal and regulatory obligations.

## Scope:

- This policy applies to all eligible Whistleblowers as defined in the definitions.

## Definitions:

- **Eligible Whistleblower** means any current or former Proveda:
  - a) officer or employee;
  - b) a volunteer or work experience placement student;
  - c) supplier, service provider, contractor or consultant (including any of their employees); and
  - d) any current or former relative, dependent or spouse of (a) - (c)who meets the criteria to access legal rights and protections for whistleblowers in the Corporations Act.

These criteria include most people with a connection to Proveda who may be able to observe or be affected by misconduct and may face reprisals for reporting it. These people can access the rights and protections in the law from when they report misconduct with reasonable grounds to do so, and do so via the appropriate channels as described in this policy.
- **Protections for whistleblowers** under the Corporations Act include

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- Protection of information provided by whistleblowers
- Protections for whistleblowers against legal action
- Protections for whistleblowers from disclosing their identity (including information that may lead to their identification).
- Protections for whistleblowers from detriment including victimisation for any qualifying disclosures

A disclosure of a personal work-related grievance may still fall under the whistleblower provisions if:

- the person suffers, or is threatened with, detriment for making the disclosure;
- the disclosure includes information about misconduct, an improper state of affairs or circumstances, a breach of the law, or danger to the public or the financial system, in addition to the personal work-related grievance; or
- the disclosure suggests misconduct that has significant implications for the company beyond the discloser's personal circumstances.

If an employee has a Personal Work-Related Grievance, concerns should be reported under the HR8.0 Grievance Resolution Policy.

- **Qualifying disclosure** is a disclosure of information to a specific position holder or body, from an eligible whistleblower who has reasonable grounds to suspect that the information concerns **disclosable matters**, including:
  - misconduct
  - an improper state of affairs or circumstances
  - a breach of certain laws,
  - an offence against Commonwealth law that is punishable by imprisonment for a period of 12 months or more; or
  - danger to the public or the financial system.

The information can be about conduct by Proveda, a Board Member or employee of Proveda, or a related company of Proveda, or an officer or employee of the related company.

The definition of '**misconduct**' in the Corporations Act includes fraud, negligence, default, breach of trust and breach of duty. '**Improper state of affairs or circumstances**' is not defined in the Corporations Act and is intentionally broad. It may not involve unlawful conduct but may indicate a systemic issue that a relevant regulator should know about to properly perform its functions. It may also relate to unethical business behaviour and practices that may cause consumer harm or a risk to public safety, or confidence in the financial system.

Examples of disclosable matters at Proveda may include:

- conduct that unreasonably results in a danger to the health and safety of a person or unreasonably results in or increases the risk of a danger to the health and safety of a person;
- conduct that results in danger to the workplace or customer's home or results in or increases the risk of danger to the workplace or customer's home;
- illegal conduct such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- fraud or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;

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- failure to comply with, or breach of, legal or regulatory requirements; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

An eligible whistleblower is not protected for a false claim. It must be an allegation they have reasonable grounds to suspect is the case.

A disclosure from an eligible whistleblower solely about their personal work-related grievance is not considered a qualifying disclosure, and therefore is not covered by the whistleblower provisions.

**Reasonable grounds** means that a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law. An eligible whistleblower can still qualify for protection even if their disclosure turns out to be incorrect.

- **Personal Work-Related Grievances** are grievances about any matter relating to the Eligible Whistleblower's employment, or former employment, having (or tending to have) implications for the Eligible Whistleblower personally. Examples of conduct not covered by this policy include, but are not limited to:
  - an interpersonal conflict between the Eligible Whistleblower and another employee, student or volunteer;
  - a decision relating to the engagement, transfer or promotion of the Eligible Whistleblower;
  - a decision relating to the terms and conditions of engagement of the Eligible Whistleblower;
  - a decision to suspend or terminate the engagement of the Eligible Whistleblower, or otherwise to discipline the Eligible Whistleblower.
- **Eligible Recipient** means the Officer or Senior Manager to whom a Qualifying Disclosure is made.

An **Officer** of Proveda includes a Director of the Board or the Company Secretary.

A **Senior Manager** is a person other than a director or company secretary who makes, or participates in making decisions that:

- affect the whole, or a substantial part of, the business of the company or organisation, or
- have the capacity to significantly affect the company's or organisation's financial standing.

At Proveda, a Senior Manager is the Chief Executive Officer or a member of the Leadership Team.

The relevant positions to whom a qualifying disclosure can be made include:

- Chief Executive Officer
- Manager, Quality & Risk
- Manager, People & Operations
- Manager, Finance & Compliance
- Manager, Service Delivery
- Manager, Community Programs

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- Manager, Partnerships & Growth
  - Provida Chairperson
  - Provida Vice Chairperson
  - Provida Board of Directors
  - Company Secretary
- **Detrimental treatment** includes intimidation, harassment, threats, coercion, action causing injury, loss or damage, discrimination, disadvantage, adverse treatment in relation to or dismissal of an Eligible Whistleblower's employment, career, profession, reputation, trade or business. Provida will regard any detrimental treatment of an Eligible Whistleblower very seriously and may take appropriate action, which could include, in the case of employees, disciplinary action and dismissal. In the case of a contractor, such appropriate actions may include suspension and/or termination of its contract with Provida.

Actions that are not detrimental conduct may include:

- Administrative action that is reasonable for the purpose of protecting an Eligible Whistleblower from detriment (EG moving an Eligible Whistleblower who has made a Qualifying Disclosure about their immediate work area to another location to prevent detrimental treatment; and
  - Managing an Eligible Whistleblower's unsatisfactory work performance, if the action is in line with Provida's performance management framework.
- **'ASIC'** means Australian Securities and Investments Commission,
  - **'APRA'**, means Australian Prudential Regulatory Authority
  - **'ATO'** means Australian Taxation Office.
  - **'Provida'** means Provida Limited and each of its related companies or entities, both current and in the future comprising 'the Provida Group'. Where used in this policy, a reference to 'Provida' or 'the Provida Group' may be to all companies or entities in the Provida Group or any one or more of the companies or entities as may be applicable in the context.
  - **'Company Secretary'** means the Company Secretary of Provida Limited or their delegate.
  - **'CEO'** means the Chief Executive Officer for Provida Limited.
  - **'Speak Up' WHISPLI Platform'** means the Provida Group 'Speak Up' platform powered by WHISPLI located at <https://Provida.whispli.com/lp/informant-reporting>
  - **'Relevant Legislation'** means the Corporations Act 2001, the Australian Securities and Investments Commission Act 2001, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 2009, the Superannuation Industry (Supervision) Act 1993, Competition and Consumer Act 2010, the Taxation Administration Act 1953, the Aged Care Act (1997), NDIS Act (2013), other tax laws administered by the Federal Commissioner of Taxation, any other Commonwealth law that is punishable by imprisonment for a period of 12 months or more, and regulations under or instruments referred to in these Acts

**Responsibilities:** (Include responsibilities for everyone mentioned in the Scope of the Policy)

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1. Proveda Chairperson
  - a. Receiving disclosures in the capacity of an Officer of Proveda.
  - b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Oversight of any qualifying disclosures in relation to the CEO.
  - d. Commissioning the external investigation of disclosable matters in relation to the CEO.
  - e. Liaising with Proveda’s legal representatives as required
  - f. Determining the outcome of any investigation in relation to disclosures pertaining to the CEO.
  - g. Keeping the Eligible Whistleblower informed of progress of and outcome of the investigation as appropriate.
  - h. Participating in applicable training for Officers on receiving disclosures.
  - i. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
2. Proveda Vice Chairperson
  - a. Receiving disclosures in the capacity of an Officer of Proveda.
  - b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Oversight of any disclosures in relation to the Proveda Chairperson.
  - d. Commissioning the external investigation of disclosable matters in relation to the Proveda Chairperson.
  - e. Liaising with Proveda’s legal representatives as required.
  - f. Determining the outcome of any investigation in relation to disclosures pertaining to the Proveda Chairperson.
  - g. Keeping the Eligible Whistleblower informed of progress of and outcome of the investigation as appropriate.
  - h. Participating in applicable training for Officers on receiving disclosures.
  - i. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
3. Proveda Board of Directors
  - a. Receiving disclosures in the capacity of an Officer of Proveda.
  - b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Liaising with Proveda’s legal representatives as required.
  - d. Determining the outcome of any investigation in relation to disclosures pertaining to the Proveda Chairperson
  - e. Keeping the Eligible Whistleblower informed of progress and outcome of the investigation as appropriate.
  - f. Participating in applicable training for Officers on receiving disclosures.
  - g. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
4. Chief Executive Officer
  - a. Receiving disclosures in the capacity of a Senior Manager of Proveda.

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- b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Oversight of any disclosures in relation to any member of the Leadership Team.
  - d. Determining the requirement for the external investigation of disclosable matters in relation to any member of the Leadership Team.
  - e. Liaising with Proveda’s legal representatives as required.
  - f. Determining the outcome of any investigation in relation to disclosures pertaining to any member of the Leadership Team.
  - g. Keeping the Eligible Whistleblower informed of progress and outcome of the investigation as appropriate.
  - h. Reporting on Qualifying Disclosures and investigation outcomes to the Proveda Board of Directors
  - i. Participating in applicable training for managers on receiving disclosures.
  - j. Creating and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
5. Company Secretary
- a. Receiving disclosures in the capacity of an Officer of Proveda.
  - b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Reporting on qualifying disclosures as appropriate to external regulatory bodies.
  - d. Reporting on qualifying disclosures to the nominated investigator.
  - e. Keeping the Eligible Whistleblower informed of progress and outcome of the investigation as appropriate.
  - f. Participating in applicable training for Officers on receiving disclosures.
  - g. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
6. Leadership Team
- a. Receiving disclosures in the capacity of a Senior Manager of Proveda.
  - b. Ensuring Eligible Whistleblowers are provided with adequate protection and support in accordance with this policy.
  - c. Reporting on qualifying disclosures as appropriate to the nominated investigator.
  - d. Keeping the Eligible Whistleblower informed of progress and outcome of the investigation as appropriate.
  - e. Participating in applicable training for managers on receiving disclosures.
  - f. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.
7. Employees, Students and Volunteers
- a. Participating in applicable training for employees to understand and comply with this policy.
  - b. Participating in and supporting a culture of ethical conduct throughout Proveda and a positive and open environment for employees.



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## Policy:

### Support and Practical Protection for Eligible Whistleblowers

1. While anonymous disclosures may be made under this policy and Applicable Legislation via the Provida 'Speak Up' platform at <https://Provida.whispli.com/lp/informant-reporting>, it can be difficult for Provida to review and investigate Qualifying Disclosures without understanding the role of the Eligible Whistleblower and being able to contact them for the purposes of obtaining further information when necessary. For this reason, Provida encourages Eligible Whistleblowers to agree to disclose their identities when making a report under this Policy if they are comfortable in doing so.
2. Except as otherwise permitted by law, an Eligible Whistleblower's consent will be obtained before his or her identity is disclosed.
3. All personal information or reference to the Eligible Whistleblower witnessing an event will be redacted.
4. The Eligible Whistleblower will be referred to in a gender-neutral context.
5. Provida will endeavour to not disclose information that is likely to lead to an Eligible Whistleblower's identification unless he, she or they have consented to Provida disclosing their identity or where the disclosure of that information is reasonably necessary for the purposes of Provida investigating the report and Provida takes all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified as a consequence of the disclosure.
6. Provida may be required to reveal the Eligible Whistleblower's identity in relation to matters which are to be reported to regulators such as the ASIC, APRA, the Tax Commissioner or the Australian Federal Police.
7. The Eligible Whistleblower's identity may also be divulged if legal advice or representation is required by Provida or where a court or tribunal finds it is necessary in the interests of justice.
8. It is illegal for a person to identify an Eligible Whistleblower or disclose information that is likely to lead to the identification of the discloser, outside of the exceptions listed at clauses 5 – 7 above. An Eligible Whistleblower can lodge a complaint with the Provida Privacy Officer about a breach of confidentiality in such an event, by email to [privacy@Provida.com.au](mailto:privacy@Provida.com.au).
9. An Eligible Whistleblower may also lodge a complaint with a regulator such as ASIC, APRA or the ATO for investigation.
10. All paper and electronic documents and other materials relating to disclosures will be stored securely.
11. Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure.
12. Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser.
13. Communications and documents relating to the investigation of a disclosure will not be sent to an email address that can be accessed by other employees.
14. In practice, people may be able to guess the Eligible Whistleblower's

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identity if

- i. The Eligible Whistleblower has previously mentioned to other people that they are considering making a disclosure;
  - ii. The Eligible Whistleblower is one of a very small number of people with access to the information; or
  - iii. The disclosure relates to information that an Eligible Whistleblower has previously been told privately and in confidence.
15. Provida will provide training to its employees, managers and officers about this Policy.
  16. Eligible Whistleblowers can access confidential support and counselling service within the Employee Assistance Program (EAP) known as Assure Programs on 1800 808 374.
  17. Where the Eligible Whistleblower may have been involved in conduct connected with the Qualifying Disclosure report, the fact that the Eligible Whistleblower made a report may, at Provida's absolute discretion, be relevant to any remedial or disciplinary action that may be taken because of an inquiry or investigation.

## Protection for whistleblowers against legal action

18. The Corporations Act protects a whistleblower against certain legal actions related to making the whistleblower disclosure, including:
  - o Criminal prosecution (and the disclosure cannot be used against the whistleblower in a prosecution, unless the disclosure is false)
  - o Civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation), or
  - o Administrative action (including disciplinary action for making the disclosure).

If you are the subject of an action for making a whistleblower disclosure, you may rely on this protection in your defence. Provida encourages Eligible Whistleblower's in this circumstance to seek independent legal advice.

The protections do not grant immunity for any misconduct that an Eligible Whistleblower has engaged in that is revealed in their disclosure.

## Protection for whistleblowers from detriment

19. Provida will endeavour to protect an Eligible Whistleblower from detrimental treatment (or threats of detrimental treatment) because they have made, are proposing to make, or are able to make, a report of information relating to disclosable matters under this policy and in accordance with the Relevant Legislation. Eligible Whistleblowers must immediately inform the CEO (or if the CEO is involved in the Qualifying Disclosure, the Chairman of the Board of Provida Limited) of any concerns they have about their report.
20. Employee Assistance Program (EAP) support services are available to Eligible Whistleblower's who are employees or volunteers of Provida, and may assist with strategies to help minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation.



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21. Provida may consider allowing an Eligible Whistleblower to perform their duties remotely, reassign the Eligible Whistleblower to another role at the same level, make modifications to the way they perform their duties or reassign or relocate other employees involved in the disclosable matter.
22. Provida will ensure that managers are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts and ensure fairness when managing the performance of, or taking other management action in relation to an Eligible Whistleblower.
23. If an Eligible Whistleblower believes they have suffered detriment, they may lodge a complaint which will be actioned in accordance with HR 8.0 Grievance Resolution Policy. The complaint will be investigated by an authorised eligible recipient independent of the dealing with the Qualifying Disclosure and the investigation findings will be provided to the CEO.
24. An Eligible Whistleblower may seek independent legal advice or contact regulatory bodies such as ASIC, APRA or ATO if they believe they have suffered detriment.
25. An Eligible Whistleblower can seek compensation and other remedies through the courts if:
  - They suffer loss, damage or injury because of a disclosure; and
  - Provida failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

### Who can receive a disclosure that qualifies for protection

26. Qualified disclosures at Provida can be made internally to:
  - Eligible Recipients as described on Page 3 of this policy.
  - The Provida ‘Speak Up’ platform, powered by WHISPLI and located at <https://proveda.whispli.com/lp/informant-reporting> can also be used by Eligible Recipients to confidentially report disclosable matters.

The report will generally be referred to the CEO.
  - Reports may also be posted in an envelope marked CONFIDENTIAL to:

Company Secretary  
Provida Limited  
PO Box 195  
Frenchs Forest NSW 1640
27. While Provida encourages Eligible Whistleblowers to use this policy, this policy is not intended to prevent an Eligible Whistleblower from making a protected disclosure to any other appropriate body such as Provida’s Auditor, ASIC, APRA, the Australian Federal Police, or, if related to taxation, the Australian Taxation Office.
28. In limited circumstances Eligible Whistleblowers may make public interest or emergency disclosures in accordance with the Relevant Legislation. Refer to Annexure 1 for legal requirements for public interest disclosures, and legal requirements for emergency disclosures.

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29. It is important that Eligible Whistleblowers understand the criteria for making a public interest disclosure or emergency disclosure, as set out in Annexure 1, and should seek independent legal advice before making a public interest disclosure or emergency disclosure.
30. Eligible Whistleblowers are encouraged to provide the Company Secretary with copies of any report that they make to external reporting bodies so that Proveda can conduct its own inquiries into the concerns that have been raised.
31. Eligible Whistleblowers may seek legal advice from or be legally represented by a lawyer in relation to their reports. Such advice is still protected even in the event that the legal practitioner concludes that a disclosure does not relate to a disclosable matter.

### How to make a disclosure

32. Confidential reports of Qualified Disclosures can be made directly to Eligible Recipients as described on Page 3 of this policy, either in person during business hours or via email, including outside of business hours or via mail.
33. Disclosures made by mail should be marked Confidential and should include the name of the Eligible Recipient and addressed to  
Proveda Limited  
PO Box 195  
Frenchs Forest NSW 1640
34. The Proveda 'Speak Up' platform, powered by WHISPLI and located at <https://Proveda.whispli.com/lp/informant-reporting?locale=en> can also be used by Eligible Recipients to confidentially and securely report disclosable matters outside of business hours. The Proveda 'Speak Up' platform also provides for Eligible Whistleblowers to remain anonymous if preferred.
35. Anonymous disclosures are still protected under the Corporations Act.
36. Eligible Whistleblowers can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. An Eligible Whistleblower can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.
37. Proveda encourages Eligible Whistleblowers who wish to remain anonymous to maintain ongoing two-way communication with Proveda so that Proveda can ask follow-up questions or provide feedback.
38. Communications with Eligible Whistleblowers who wish to remain anonymous may be through the Proveda 'Speak Up' Platform. An Eligible Whistleblower may adopt a pseudonym within the platform for the purpose of their disclosure.
39. Proveda may not be able to undertake an investigation if it is not able to contact an Eligible Whistleblower if a disclosure is made anonymously and the Eligible Whistleblower has refused to provide, or has not provided a means of contacting them.

### Investigation

40. Proveda will endeavour to finalise the handling and investigation of matters disclosed within 21 days of receiving a Qualifying disclosure. Depending

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on the nature of the disclosure, the process may vary from the steps below.

41. All inquiries and/or investigations will be conducted, as far as practicable, on a confidential basis and in accordance with the Relevant Legislation.
42. The CEO (or the Chairperson of Provida if the CEO is implicated) may initially review the report or may provide the report to another appropriate person within Provida, for example, by having regard to the nature of the report.
43. The person conducting the review will make initial inquiries and will determine at their discretion whether it is appropriate or necessary to conduct further inquiries or whether the concern can be resolved by other appropriate action.
44. If there is to be further inquiry, that inquiry or investigation may be conducted by a senior manager at the discretion of Provida, or by an external person. The investigator will not be implicated directly or indirectly in the report and will report to the CEO, (or if the CEO is implicated, the Company Solicitor on behalf of the Chairperson of Provida Limited).
45. The CEO (or their delegate), or the Chairperson of Provida Limited Board (or their delegate) if the Company Secretary is implicated, and the person conducting the inquiry or investigation will to the extent it is reasonable, keep the Eligible Whistleblower updated on the investigation and any action taken in relation to the Eligible Whistleblower's report.
46. Findings from the investigation will be documented and reported to the CEO, (or if the CEO is implicated, the Chairperson of Provida Limited).
47. The method for documenting and reporting the findings will depend on the nature of the disclosure.
48. Provida may provide updates to an Eligible Whistleblower during key stages such as
  - i. When the investigation process has begun;
  - ii. While the investigation process is in progress; and
  - iii. After the investigation has been finalised.
49. The Eligible Whistleblower will be informed when an investigation has been finalised. Depending on the nature of the disclosure, it may not be appropriate to provide outcomes of the investigation to the Eligible Whistleblower.
50. If an Eligible Whistleblower is not satisfied with the outcome of the investigation, they may request a review of the whether Provida's policy and processes were adhered to via the HR 8.0 Grievance Resolution Policy.
51. Provida is not obliged to re-open an investigation and can conclude a review if it finds that the investigation was conducted properly, or that new information is either not available, or would not change the findings of the investigation.
52. Employees who knowingly make a false Qualifying Disclosure report may face disciplinary action, including immediate termination in serious cases. In the case of a contractor, actions may include suspension and/or termination of its contract with Provida.
53. The disciplinary action will depend upon the severity, nature and

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circumstances of the false report.

## Fair Treatment of Individuals Mentioned in a Qualifying Disclosure

54. An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of procedural fairness and prior to any actions being taken.
55. Disclosures will be handled confidentially, when it is practical and appropriate in the circumstances.
56. Each disclosure will be assessed and may be the subject of an investigation.
57. When an investigation needs to be undertaken, the process will be objective, fair and independent.
58. Employees who are mentioned in any Eligible Whistleblower's report may access the Employee Assistance Program known as Assure Programs on 1800 808 374.

## Ensuring the 'Speak Up – Whistleblower Protection Policy' is easily accessible

59. Provida will make the 'Speak Up - Whistleblower Protection Policy' available internally to Provida Directors, Committee Members, Managers, Employees, Students and Volunteers via the following methods as appropriate:
  - i. Holding briefing sessions for Employees and Students and conducting annual refresher training about the policy
  - ii. Conducting training with managers in how to effectively deal with disclosures
  - iii. Making the policy available on the HRIS
  - iv. Incorporating the policy as part of Directors and Committee Members Onboarding packs
  - v. Incorporating the policy as part of Employee Onboarding training and policy acknowledgement
  - vi. Providing the policy with Volunteer Onboarding packs
60. Provida will make the 'Speak Up - Whistleblower Protection Policy' available to external stakeholders via the Provida Website:

### **Exclusions:**

- (None noted as yet).

### **References:** (include any relevant Provida policies, links to credible resources or websites)

1. HR 2.4 Gifts and Hospitality Policy
2. GD 8.0 Conflict of Interest Policy
3. <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/>
4. <https://download.asic.gov.au/media/5702691/rg270-published-13-november-2019-20200727.pdf>



## Annexure 1

### Legal Requirements for Public Interest Disclosures

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the discloser has given written notice to the body in point (a) (i.e. the body to which the previous disclosure was made) that:
  - i. includes sufficient information to identify the previous disclosure; and
  - ii. states that the discloser intends to make a public interest disclosure.

### Legal Requirements for Emergency Disclosures

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the discloser has given written notice to the body in point (a) (i.e. the body to which the previous disclosure was made) that:
  - i) includes sufficient information to identify the previous disclosure; and
  - ii) states that the discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.