



2Flourish

Whistleblower Policy

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About the policy

This policy outlines 2Flourish's commitment to detecting and preventing illegal and other undesirable conduct including, a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

Scope

This policy applies to all employees, volunteers, contractors, clients, and any other individuals associated with 2 Flourish.

Definitions

Examples of potential misconduct include but are not limited to:

- breach of 2Flourish's Vision, Mission, Code of Conduct, Contracts of Employment or other 2Flourish policies or standards.
- breach of the NDIS Code of Conduct or guidelines.
- dishonest, unethical, or irresponsible behaviour.
- failure to comply with, or breach of legal or regulatory requirements.
- criminal activity.
- bribery or corruption.
- misrepresentation.
- conduct endangering health and safety.
- conflicts of interest, including those relating to outside business interests, relationships, improper payments, and donations.
- victimisation or harassment.
- misleading or deceptive conduct, including conduct or representations which amount to improper or misleading accounting, taxation, or financial reporting practices.
- conduct endangering the health and safety of any person or persons.
- breaches of privacy.
- unauthorised use of 2Flourish's confidential information.
- concerns that pose a danger to the public or financial system (even if it does not involve a breach of law).
- 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 of potential misconduct.
- and deliberate concealment of any of the above.

Principles

2Flourish has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their Senior Support Partner or Manager. If you are not comfortable speaking with your Senior Support Partner or Manager or you are not satisfied with their response, you are encouraged to speak with an appropriate Manager, Director, or People Operations.

Senior Support Partners or Managers are required to report complaints or concerns about suspected misconduct to a Director or to People Operations, who have the responsibility to investigate complaints.

Employees with concerns or complaints may also submit their concerns in writing directly to their Senior Support Partner/Manager, Director, or People Operations.

Investigating Officers

The investigating officer/s will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

The investigating officer/s is/are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved and will advise 2Flourish Directors of all complaints and their resolution.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Policy Statement

2Flourish is committed to the highest standards of conduct and ethical behaviour in all our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and corporate governance.

2Flourish encourages the reporting of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving Managers, employees, contractors, and the organisation. 2Flourish provides protections and measures so that those persons who make a genuine report may do so confidentially and without fear of intimidation, disadvantage, or reprisal.

Whistleblower Software

2Flourish and the Ace Disability Care Internal Staff Reporting System.

As an employee, you can report serious matters anonymously or if you have reasonable suspicion of such matters. From the Whistleblower software, you can make a new secure report or follow up on an existing report.

Anonymous reporting of serious matters

Through this Whistleblower software, you can submit information anonymously about serious matters or report actions that are unethical, illegal or in violation of internal policies and the code of conduct. This scheme is to be used to bring matters to light that would not otherwise have come to light.

Matters can be reported confidentially with indication of name and contact information or, if desired, 100% anonymously. All inquiries are to be treated confidentially and securely.

People Operations (HR) related matters

HR related matters cannot be reported in this system, but must instead be discussed with the immediate manager, Director, or People Operations.

Following up on your reports can be relevant for numerous reasons:

1. You wish to see the status of your report, to check if action is being taken.
2. You wish to provide additional information to your report.
3. The system administrators have requested additional information from you to help them resolve

the issue or take the appropriate action.

Access to the Whistle-blower Software and 2Flourish internal staff reporting system can be accessed by using the QR code below:



Responsibilities

All persons covered by the scope of this policy are required to:

- Comply with this policy.
- Behave appropriately.
- Promote a climate of mutual respect.

It is the duty of those investigating complaints to treat all information as confidential and to protect the privacy of those making a complaint.

Anyone making a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Related Policies and Procedures

Code of Conduct

Bullying Harassment and Discrimination Policy

NDIS Manual

Workplace Health and Safety Policy

Related Legislation

Privacy Act 1988