



# Whistleblowers Policy and Procedure

## Purpose and Scope

The Whistleblowers Policy and Procedure are maintained within Combined Living Care to eliminate any fraudulent conduct or coercion risk. Combined Living Care will clearly communicate and inform all personnel about the standards and regulations of this policy and procedure.

All personnel must understand and acknowledge the Whistle-blowers Policy and Procedure. Any individual who has not adhered to this policy and procedure will endure serious consequences.

This extends to all employees and meets relevant laws, regulations, and standards.

## Definitions

Whistle-blower	A person who reports on a person or organisation regarded as engaging in unlawful or immoral activity.
Corrupt	Having or showing a willingness to act dishonestly in return for money or personal gain.
Disclosure	The action of making new or secret information known.
Delegate	A person sent or authorised to represent others, in particular an elected representative sent to a conference.

## Policy

Combined Living Care implements the Whistleblowers Policy to ensure all individuals are granted an adequate working environment that is free of any dishonest and unethical

behaviour. All personnel must remain honest, and confidential of all Combined Living Care's information and actions.

Combined Living Care will provide each individual with the necessary information that is required to offer a person a valuable understanding of the Whistleblowers Policy. Each person is expected to abide by and follow this policy. Failure to do so will result in extreme consequences.

## **Worker Responsibilities**

- To abide by this Policy and Procedure
- To report all potential whistle-blowers
- To remain truthful and honest if reporting any whistle-blowers

## **Management Responsibilities**

- Provide all necessary and correct information to ensure that all individuals understand and recognise the importance of the Whistleblowers Policy and Procedure.
- To conduct a fair investigation.
- Ensure all aspects and information is recorded and correctly reflect the events.
- Implement all corrective actions where required.

## **Procedure**

The Whistleblowers Procedure outlines the importance of maintaining and providing an appropriate and positive work environment free from corrupt conduct. This procedure must be taken seriously, and all personnel are implementing and following the expected regulations.

The individual answerable for the receipt of data associated with potential misconduct, or a problematic situation that may occur, is referred to as the delegate. The delegate is the key personnel who is responsible for dealing with all transgressions that may arise within Combined Living Care. If for any reason the assigned delegate is not the appropriate body to resolve or investigate a complaint made to them, then Combined Living Care will designate an alternative individual that can make a suitable decision.

Any person who has witnessed any form of whistleblowing within Combined Living Care is expected and advised to contact the delegate immediately. Once they have made a formal complaint to the delegate, the disclosure may request an external meeting that is not located at Combined Living Care, to ensure privacy and confidentiality are present. When the individual has submitted a complaint, then the delegate will assess and review the provided information. The delegate will then assess if the disclosure is a citizen's passion disclosure and evaluate the matter for the basic components of a secure disclosure.

## **Investigation of Whistleblowers**

In the event a Whistleblower is present within Combined Living Care, an investigation will be conducted. However, before an investigation is conducted, the individual who is submitting the complaint will be advised to provide any additional information and materials that could help further the investigation process. The Owner/CEO/Director or other authorised personnel will be responsible for investigating and resolving the matter. The assigned delegate or investigator will communicate all relevant and required bodies to be able to proceed with the investigation. They are also required to establish a date in which the investigation will be completed.

The delegate is also responsible for creating a plan, which entails all necessary information that will help to resolve the case. The form should include the following; however, it is not limited to:

- Personal details of both the discloser and the alleged persons.
- Thorough details explaining the events that occurred, ensuring all are honest and reflect the correct actions.
- All information and evidence that a person possesses.
- Identify the people who are involved in the investigation. This should include the delegate, disclosure, the alleged whistle-blower, and any witnesses that may be involved.

The delegate must protect the alleged individual's identity to ensure no foul play or misconduct is furthered. It is the responsibility of the delegate to take extra precautionary measures to protect their role in the investigation. Once the timing is deemed appropriate, the alleged victim's identity will be released; however, it must be made known to that individual before doing so. The delegate will frequently communicate any updated case information to all parties involved.

Once the delegate has conducted an investigation, they must complete a thorough written report, which will have recorded all the actions and findings that were involved throughout the investigation. They are then expected to submit all documents to key personnel who were never involved in the investigation. The delegate is also expected to maintain the confidentiality of the identity of the individual who has been disclosing information for the case. The only instance where the discloser's identity is to be released is if the discloser has recruited legal advice. All documentation that has been created from the investigation will be made as a copy and given to the disclosure.