

### 1. Policy

Abbeyfield Australia and its affiliated local Abbeyfield societies are committed to high standards of conduct and ethical behaviour. This policy aims to ensure that employees, volunteers and directors can raise concerns without fear of reprisal.

This policy aims to encourage people to report an issue if they genuinely believe someone has contravened the Code of Ethical Conduct, Conflict of Interest Policy or the law.

### 2. Who does this policy apply to?

This policy applies to all employees, volunteers, directors inclusive of Board members of Abbeyfield Australia and its affiliated local Abbeyfield societies.

### 3. What concerns should be raised?

All employees, volunteers and directors are encouraged to report any genuine matters of concern that they honestly believe contravene Abbeyfield Australia's Code of Ethical Conduct. This will include:

- Conduct or practices which are illegal
- Corrupt activities
- Theft , fraud, misappropriation
- Significant mismanagement of funds or resources
- Abuse of authority
- Serious harm to public, resident, volunteer or employee safety

### 4. Procedure

A person who becomes aware of any matter of concern or behaviour that they think seriously contravenes the Code of Ethical conduct, Conflict of Interest policy or the law should raise the matter with (in order):

- their immediate supervisor (if an employee of a local society)
- the Manager for issues relating to an Abbeyfield Hostel
- the CEO of Abbeyfield Australia
- the Chairman or another member of the Board of Abbeyfield Australia (if raising the matter with the CEO of Abbeyfield Australia is not appropriate)

### 5. Investigating concerns

Abbeyfield Australia will investigate all reported concerns and where appropriate will provide feedback regarding the outcome. Abbeyfield Australia will take any necessary action as a result of a report and if no action is taken will give an explanation.

Authorising officer:	Approval date:	Scheduled review date	Document No.	Issue No:	Page:
Chairman	8 March 2010	30 Sept 2013	TBD	1	1

### 6. Protection of whistleblowers

A whistleblower will not be discriminated against or disadvantaged for making a report in accordance with this policy. This applies if the matter is proven or not, regardless of whether it is reported to an external authority.

Abbeyfield Australia will not disclose the identity of any person who makes a whistleblower report unless:

- it is required to do so by law
- it is required to assist a police investigation
- the identity of the whistleblower would be self evident by the nature or location of the report
- it is impossible to investigate the issue without divulging the identity of the whistleblower.

In all instances where the identity of the whistleblower is likely to be disclosed, Abbeyfield Australia will try to give prior notice to the whistleblower.

### 7. Responsibility to act in good faith

Whistleblowing is about reporting real or perceived malpractice. If a report is not made in good faith, or is found to be malicious, deliberately misleading or frivolous, the Whistleblower may be subject to disciplinary action.

### 8. Linked Policies

- . Code of Conduct & Ethics
- . Conflict of Interest

### 9. Quality Assurance

- . Employees, volunteers and directors and directors are aware of this policy
- . Any incidents dealt with in accordance with this policy.

### 10. Approval

This policy was approved in principle by the Abbeyfield Australia Board on 13 February 2010 and finalised under the Chairman's authority on 8 March 2010.

Authorising officer:	Approval date:	Scheduled review date	Document No.	Issue No:	Page:
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