



Whistleblower Procedure

Procedure number	WB1	Version	0.2
Drafted by	Andria Pugh	Approved on	January 2020
Authorised person	Rita Lang	Scheduled review date	January 2021

1. Responsibilities

- 1.1 **Whistleblowing Protection Officer (Bridges CEO)** is responsible for:
- Receiving whistleblower reports and protecting the interests of reporters
 - Determining whether the report falls within the scope of the Policy
 - Determining whether and how a report should be investigated
 - Appointing a Whistleblowing Investigator where an investigation is deemed appropriate
 - Ensuring investigations are conducted in accordance with this Policy
 - Updating reporters on progress and details of outcomes to the fullest extent possible
 - Maintaining to the fullest extent possible confidentiality of the identity of and reports received by reporters
 - Determining the appropriate courses of action to remediate or act on the investigation
 - Reporting matters to relevant authorities
 - Making recommendations to prevent future instances of reportable misconduct
 - Seeking to ensure the integrity of the Whistleblower Program is maintained.
- 1.2 **Whistleblower Investigators (Bridges board members)** are responsible for:
- Investigating reports in accordance with this Policy and Procedure
 - Maintaining to the fullest extent possible confidentiality of the identity of and reports received by reporters
 - Gathering evidence and taking steps to protect or preserve evidence
 - Making findings based on a fair and objective assessment of the evidence gathered during the investigation, and formalising this in a report
 - Keeping comprehensive records about the investigation
 - Making recommendations to the Whistleblowing Protection Officer about how to implement the strategy in relation to how reported misconduct can be stopped, prevented and/or mitigated in future
 - Reporting back to the Whistleblower Protection Officer on the progress of their investigation 7 days after the report and every 14 days thereafter
 - Complying with the directions of the Whistleblower Protection Officer in relation to any further follow up, and reporting action and requirements, including the implementation of any recommendations.
- 1.3 **Workers** are responsible for reporting misconduct or dishonest or illegal activity that has occurred or is suspected within Bridges as quickly as possible, whether anonymously or otherwise.

2. Procedure

2.1 How do I make a report?

- 2.1.1 Whistleblowing protections will only apply to reports of Reportable Conduct made in accordance with this Policy and Procedure.
- 2.1.2 Where you have reasonable grounds to suspect that an individual has engaged in Reportable Conduct, you should report the matter to:
 - a) Rita Lang, Bridges CEO – Whistleblower Protection Officer
 - b) Independent Whistleblower service if report concerns the CEO
The Active Ageing & Disability Services Manager, c/o Knox City Council
- 2.1.3 If you are not comfortable or able to report Reportable Conduct to either of the above, you may report it to ASIC.

2.2 How are reports investigated?

- 2.2.1 After receiving your report Bridges WPO will:
 - a) assess the report of Reportable Conduct;
 - b) consider whether there are any conflicts of interest prior to investigating;
 - c) determine whether external authorities need to be notified;
 - d) determine whether and how to investigate; and
 - e) appoint a Whistleblowing Investigator if appropriate.
- 2.2.2 If an investigation is deemed necessary, it will be conducted fairly, objectively and in a timely manner. The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided.
- 2.2.3 Any individuals who are accused of misconduct in a report (a Respondent) will have an opportunity to respond to allegations before any adverse findings are made and before any disciplinary action (if appropriate) is taken.
- 2.2.4 Bridges may need to speak with a Whistleblower as part of an investigation. If the identity of the Whistleblower is known, Bridges will endeavour to keep them informed about the status of an investigation.
- 2.2.5 If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the individual who reported the Reportable Conduct will be notified at the earliest possible opportunity.

2.3 Outcome of an investigation

- 2.3.1 At the conclusion of the investigation, a report will be prepared outlining:
 - a) a finding of all relevant facts;
 - b) a determination as to whether the allegation(s) have been substantiated or otherwise;
 - c) the action that will be taken, which may include disciplinary action and dismissal.
- 2.3.2 The disciplinary action will be dependent on the severity, nature and circumstances of the Reportable Conduct.
- 2.3.3 Where possible and appropriate, having regard to Bridges privacy and confidentiality obligations, the Whistleblower will be informed of the outcome of any investigation into their concerns.

2.4 Process Steps

Step	Activity Group	Activity	Responsible Person
1	Receipt of report	Assign a unique reference number and date stamp the receipt of the report	Whistleblower Protection Officer
2	Assessment of how and who should investigate	Assess whether the incident needs to be handled by the WPO or assigned to a relevant WPI, maintaining anonymity if requested. Assess if other BRIDGES policies are applicable for dealing with the incident	Whistleblower Protection Officer
3	Maintain Records	Maintain a secure and restricted record of the investigation steps	WPO or WPI
4	Approach and Progress update	Report investigation approach / progress updates to the board within 7 days of receipt of misconduct report and thereafter every 14 days until investigation complete.	WPO or WPI
5	Determine Action	Determine appropriate courses of action to remediate and present recommendations to the board	WPO or WPI
6	Prevention of future cases	Make recommendations to the board to stop, prevent or mitigate the reported misconduct	WPO or WPI
7	Evidence	Take steps to protect or preserve evidence such as documents, materials and equipment, keep comprehensive records of the investigation process	WPO or WPI
8	Follow Up	Ensure any further follow up, reporting action and requirements including implementation recommendations to prevent further misconduct are acted upon	WPO

Report Template

Section A: Please leave this section blank if you wish to remain anonymous

Name	
Address	
Contact Details – Telephone	
Contact Detail - email	

If you wish to remain anonymous and not provide your name and contact details, you will need to recontact the service and quote your unique identification number to receive feedback from BRIDGES

Section B: Incident details

1	Please indicate the incident type you are reporting: <input type="checkbox"/> Theft & Fraud <input type="checkbox"/> Bribery & Corruption <input type="checkbox"/> Privacy & Confidentiality <input type="checkbox"/> Conflict of Interest <input type="checkbox"/> Maintain safe working environment <input type="checkbox"/> Discrimination, bullying & harassment <input type="checkbox"/> Breach of policy <input type="checkbox"/> Other
2	Describe the issue you wish to report
3	When did this occur? (Time, date)
4	Has this occurred before? (Frequency / Period of time)
5	Where did this incident occur? (Place, location)
6	Were other people involved? (Name of people if relevant / not confidential)
7	How did this issue occur? (indicate the steps, events that occurred)
8	Is there any physical evidence? (Documentation/witnesses)
9	Have you previously raised this issue with anyone? (Who and when)
10	Was anyone injured? Please give details of injury
11	Please include any further information relevant to this incident

Please also include any additional attachments you feel may help this disclosure, taking care not to include any information that will reveal your identity if you wish to remain anonymous.