Policy

Policy name	Whistleblower Policy
Policy number	QM-POL-021
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Version	1.0
Responsible S-MT	Quality Management

one tree community services

Whistleblower Policy

Purpose

This policy will:

i. encourage and enable individuals to make disclosures about actual or suspected wrongdoing within the Organisation, in line with the eligibility requirements set out under the whistleblower protection laws;

ii. ensure transparency, integrity, and accountability in our operations, and

iii. provide protections, without fear of retaliation or reprisal, to eligible whistleblowers under applicable Australian law.

Scope

This policy applies to current and former employees (permanent, part-time or casual), board members, suppliers, volunteers, and associates of the Organisation, including families and clients, and the relatives, dependents or spouses of the people listed.

Policy statement

General

1. The *Organisation* ensures staff have access to policies. Where definitions are required to support understanding, the words are in *italics*.
2. The *Organisation* commits to complying with all relevant statutory obligations and protections.

Eligible disclosures

3. The person making a *disclosure* (the "*discloser*" or "*whistleblower*") must have *reasonable grounds* to suspect the information shows misconduct or a breach of the law, to be eligible under this policy.
4. A *disclosure* is eligible under this policy if it concerns information about actual or perceived misconduct, an improper situation or circumstance, whether past, present, or future. This includes, but not limited to:

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a. breaches of laws or regulations;

b. fraud, theft, corruption, bribery;

c. dishonest or unethical behaviour;

d. health, safety, environmental risks;

e. misuse of Company assets;

f. failure to comply with regulatory obligations;

g. financial irregularities;

h. conduct that is inconsistent with the *Organisation's* Code of Conduct or policies; or

i. attempted or actual cover-up of wrongdoing.

Who may make a disclosure

5. Eligible *whistleblowers/ disclosers* include:

   a. current and former employees;

   b. contractors, suppliers, consultants (and their employees);

   c. *officers* of the *Organisation;*

   d. relatives or dependants of the above, or people acting on their behalf; or

   e. any *associate* of the *Organisation* in relation to which the *disclosure* concerns the *Organisation.*

6. Anonymous *disclosures* are permitted, though *disclosers* are encouraged to identify themselves to ensure the claim can be investigated thoroughly and gather all the necessary details. Refer to the section 'Anonymous disclosures' for further information.

7. An eligible *whistleblower*, who makes a *disclosure,* must have *'reasonable grounds* to suspect' the information shows misconduct or a breach of the law to qualify for protection. This means that even if a *disclosure* turns out to be incorrect, the protections still apply, provided the eligible whistleblower had *'reasonable grounds* to suspect'.

To whom disclosures may be made

8. To ensure legal protection, *disclosures* must be made to "Eligible Recipients." These may include:

   a. *The Board*, or a specified Director (e.g. the Chair)

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b. The Chief Executive Officer (CEO) or Executive Director (ED)

c. Internal auditors

d. External auditors

e. ASIC, APRA or other statutory regulators

9. A *disclosure* may be made:

a. in writing (e.g. email, secure web portal, letter);

b. verbally (in person or by phone, with subsequent written record); or

c. anonymously.

10. When making a *disclosure*, the *discloser* must provide as much relevant information as possible, including dates, participants, documents, and context, to enable a comprehensive investigation.

11. Disclosures are managed in accordance with QM-PRO-020 Whistleblower Report Procedure.

Support for eligible whistleblowers/disclosers

12. The *Organisation* ensures that support services (e.g. counselling, employee assistance programs) are made available to *disclosers*.

13. *Disclosers* may have a support person (internal or external) during interviews or proceedings.

14. The *Organisation* prohibits any form of retaliation, disadvantage, or detriment (direct or indirect) against a person for making a *protected disclosure* or assisting in an investigation. This includes, but is not limited to dismissal, demotion, harassment, discrimination, threats, or other adverse actions.

15. The *Organisation* monitors for signs of retaliation or adverse effects and acts quickly to remedy. Individuals who retaliate against *whistleblowers* or obstruct the process may also face legal or regulatory consequences under relevant legislation or the *Organisation's* policies.

16. If a *whistleblower* believes they have been subject to retaliation, they must raise this immediately with the CEO.

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Confidentiality

17. The *Organisation* manages all *disclosures* and the identity of *disclosers* in accordance with QM-POL-019 Confidentiality and Privacy NQS Policy. The identity and any information that may lead to the identification of the discloser is withheld, unless prior consent has been given, or where permitted by law.

18. When referring to the *discloser* internal referrals and communications must use neutral terms (e.g. the discloser) to avoid accidental identification.

19. If it is necessary for the investigation, only those staff directly involved in handling or investigating the matter (and bound by confidentiality) have access to identifying information.

20. The *Organisation* takes reasonable steps to protect against inadvertent or unauthorised identification of the *discloser*.

Anonymous disclosures

21. An eligible *whistleblower* can choose to make a *disclosure* anonymously. If they are concerned their true identity may become known, they can adopt a pseudonym (not their true name) for the purposes of their *disclosure*, or create an anonymous email address to submit their *disclosure* to an "Eligible Recipient", as defined in clause 8 of this policy.

22. Anonymous *disclosures* are protected in accordance with the relevant statutory obligations and protections.

23. In some cases, it may be more difficult for the *organisation* to investigate an anonymous *disclosure*. However, it may be possible to address this if the *whistleblower* provides a means of contact for any follow up questions (e.g., via an anonymous email address).

Assessment of disclosure

24. The Workplace Relations Lead conducts an initial assessment of the *disclosure* to determine whether it is protected under the *whistleblower* provisions of the Australian Corporations Act 2001.

25. If the *disclosure* meets the criteria the matter is referred for investigation in accordance with HR-PRO-016 Investigation Procedure.

26. If the *disclosure* is not covered under this policy, it may be reviewed under other relevant processes or in accordance with HR-POL-016 Staff Dispute and Grievance NQS Policy.

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Investigation process

27. Investigations are conducted promptly, fairly, and impartially, and in accordance with organisational policy and procedures.
28. *Whistleblowers* may request updates on progress and outcomes (subject to confidentiality and legal obligations).
29. Findings are reported to relevant parties as appropriate.
30. Corrective actions are taken where misconduct is substantiated.

Record keeping

31. All *disclosures*, investigations, and outcomes must be documented and retained securely in accordance with legislative requirements, as outlined in QM-POL-001 Records Management NQS Policy and QM-POL-109 Confidentiality and Privacy NQS Policy.

Reporting requirements

In accordance with QM-FOR-014 Organisational Chart and Reporting Requirements.

Legislation compliance

Refer to QM-SS-001 Regulations and Legislation Register.

Related policies, procedures forms and checklists

The following documents support the implementation of this policy:
QM-HB-002 OTCS Code of Conduct
QM-POL-001 Records Management NQS Policy
QM-POL-109 Confidentiality and Privacy NQS Policy
QM-PRO-020 Whistleblower Report Procedure
HR-POL-016 Staff Dispute and Grievance Procedure
HR-PRO-016 Investigation Procedure

Definitions

Associate: any person or group of people involved with the Organisation.
Whistleblower / Discloser: the person making a disclosure, eligible under the whistleblower protection laws.
Officers: members of the Organisation's board.
Organisation: One Tree Community Services Incorporated.
Disclosure: a disclosure that qualifies under the applicable law for protection.

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Reasonable grounds: means a reasonable person in the same position as the person making the disclosure would also believe the information shows misconduct or a breach of the law.
Stakeholders: any person or group of people involved with the Organisation.
Supplier: an individual or entity who has supplied good or services to an Organisation.
Volunteer: an individual who has willingly performed unpaid work for an Organisation.

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Version History

Version (ISOC only)	Submitted by (SMT)	Change Date (SMT)	Approver (QMT)	Approval Date (QMT)	Description (SMT/QMT/ISOC)
1.0	Coral Callan	14/11/25	Karri Hillier	25/11/2025	New policy. Requirement under the Corporations Act.

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