

What is the Purpose?

This policy is to provide an avenue for any person to report instances of corrupt or illegal conduct by Northcott, its Board or staff, without fear of retribution. It also ensures that Northcott and its staff act at all times in compliance with all laws and the ethical standards set out in the Northcott Mission, Values and Code of Conduct.

Who needs to know about this Policy and Procedure?

- All Northcott Staff

What is Northcott's policy?

- ✓ The organisation and its staff, act at all times in compliance with all laws and the ethical standards set out in the Northcott Mission, Values and Code of Conduct.
- ✓ Staff can report their concerns freely and without fear of repercussion where the person explicitly claims Whistleblower status.
- ✓ Northcott Services operate to the highest ethical standards by allowing any person to report instances of corrupt or illegal conduct by Northcott, its Board, management or staff.
- ✓ A Whistleblower is protected from retribution only if they bring the reportable conduct to Northcott in the first instance and provide Northcott with a reasonable opportunity to investigate and correct the alleged activity.
- ✓ Northcott will not retaliate against:
 - Any person acting in good faith, who has protested or raised a complaint against some practice of:
 - Northcott
 - Another individual involved with Northcott
 - An entity who Northcott has a business relationship with on the basis of a reasonable belief that the practice is in violation of the law or Northcott's code of conduct.
 - Any person who discloses or threatens to disclose to a supervisor or a public body - any activity, policy or practice of Northcott that the staff reasonably believes is in violation of a law or a clear mandate of public policy concerning the health, safety or welfare of people or protection of the environment.

What are the procedures?

- A report can be made by any person acting in good faith that believes that some conduct of Northcott, its Board, managers or staff is:

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 1 of 6

- Dishonest
- Fraudulent
- Corrupt
- Illegal (including drug sale/use, violence or threatened violence and criminal damage against property)
- In breach of Commonwealth or State legislation
- Unethical (representing a breach of Northcott's code of conduct)
- Other serious improper conduct
- An unsafe work practice
- Any other conduct which may cause financial or non-financial loss to Northcott or be otherwise detrimental to the interests of Northcott.
- The report can be a verbal or written report to the:
 - Chief Executive Officer (CEO)
 - Deputy Chief Executive Officer(DCEO)
 - KPMG's Fair Call Reporting Service
- If the person is located outside the Northcott Parramatta Office and wishes to make a verbal report, the CEO or DCEO will arrange to meet that person in their own area.
- Any arrangements to meet a person who is making a report under the Whistleblower Policy will be done in a way to protect their confidence and anonymity. For example; meeting outside the work environment.

False Reporting

- Where it is shown that a person claiming to be a Whistleblower has knowingly made a false allegation, they will be dealt with under Northcott's [Discipline Policy and Procedure](#).

Unauthorised Release of Information

- Any information given by the Whistleblower must not be released without authority to any person who is not involved in the investigation or resolution of the matter.
- This includes information that may lead to the identification of the Whistleblower.
- A breach of this policy will be dealt with under Northcott's [Discipline Policy and Procedure](#).

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 2 of 6

KPMG Fair Call Reporting Service	
<p>What is it?</p>	<ul style="list-style-type: none"> The <i>FairCall</i> service provides Northcott staff with the option of contacting an independently monitored, external, anonymous service to report their concerns of possible fraudulent or unethical conduct if they are not comfortable contacting the Chief Executive Officer or Deputy CEO for any reason. If the matter does not relate to such issues, please contact Northcott directly.
<p>How do you contact them?</p>	<p><i>KPMG FairCall Hotline</i></p> <ul style="list-style-type: none"> A toll-free service for the use of Northcott staff, which is monitored by trained and experienced professional personnel. The phone number is 1800 500 965. Calls will be received by <i>FairCall</i> on recognised business days between 7.00am and 5.00pm (AEST). Outside these times, calls are diverted to a mobile phone. In the unlikely event that calls are not answered by the mobile, a voicemail service provides staff with the ability to leave their details or to call back during normal operating hours. <p><i>Email access</i></p> <ul style="list-style-type: none"> Northcott staff are able to report matters using the email address faircall@kpmg.com.au. This may restrict the ability of the caller to remain anonymous; however <i>FairCall</i> will ensure all details are kept confidential. This facility may also be used to communicate with our operators subsequent to a call. <p><i>KPMG Mailing Service</i></p> <ul style="list-style-type: none"> Northcott staff are able to mail reports or additional call information to a secure mailbox at the following address: <p style="text-align: center;"> The <i>FairCall</i> Manager PO Box H67 Australia Square Sydney NSW 1213 </p>

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 3 of 6

KPMG Fair Call Reporting Service	
<p>How is my information kept confidential?</p>	<ul style="list-style-type: none"> • KPMG will allocate each staff that contacts <i>FairCall</i> with a confidential identification number and will provide Northcott with a call reference number. • KPMG will not ask for or record other personal details of the staff, unless the staff expressed that they do require their details to be retained by KPMG or forwarded to Northcott. • Where KPMG collects personal information as part of this service, it is provided in accordance with KPMG Australia's Privacy Statement. • This statement can be found at https://home.kpmg.com/au/en/home/misc/privacy.html
<p>How is my report investigated?</p>	<ul style="list-style-type: none"> • Once a report has been made to the appropriate Northcott Officer, that Officer will initiate an investigation of the allegation, taking care to protect the Whistleblower from any repercussion from the organisation or any individual staff, such as dismissal, demotion, any form of harassment, discrimination, current or future bias. • The investigation may be conducted by the CEO or by someone internal or externally appointed by the CEO. Any such person must maintain the strictest confidence, while observing the principles of natural justice in their investigation. • When the report is finalised, any recommendations are the responsibility of the CEO to implement. • The staff reporting the matter is to be provided with feedback on the outcome of their allegations. • Where the Whistleblower is not satisfied with the outcome of the investigation they have the option of referring the matter to the Chair of the Board, or to an external body, such as the NSW Ombudsman.

Where can I get help?

- Contact HR

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 4 of 6

What other Northcott documents are related?

You may need to refer to these documents for more information:

[Code of Conduct](#)

[Discipline and Policy and Procedure](#)

[Fraud Prevention and Control Procedure](#)

[Grievance Policy and Procedure](#)

Who is responsible?	What are they responsible for?
Chief Executive	<ul style="list-style-type: none"> Final review and approval of this policy and procedure. Make sure the Whistleblower is protected in the event of them making a report.
General Manager People and Culture	<ul style="list-style-type: none"> Maintain this policy, its related procedures and documents.
Level 3 and 4 Manager	<ul style="list-style-type: none"> Make sure the policy is effectively implemented in their services. Make sure staff follow the policy and procedure. Make sure staff are made aware of the protection that this policy offers them. Make sure that staff feel supported to report illegal or corrupt conduct under the Whistleblower policy, and that their anonymity is protected if they request it.
Supervisor	<ul style="list-style-type: none"> Make sure staff have read and understand the policy and procedure, and have sufficient skills, knowledge and ability to meet the requirements. Make sure that staff feel supported to report illegal or corrupt conduct under the Whistleblower policy, and that their anonymity is protected if they request it.
All Staff	<ul style="list-style-type: none"> Follow the requirements of the policy and procedure. Only make reports which they believe, in good faith, meet the terms of the policy.

Definitions, Legislation & Standards Compliance

Definitions:

- Reportable Conduct:** Conduct by a person or persons connected with Northcott which is:
 - Dishonest
 - Fraudulent
 - Corrupt

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 5 of 6

- Illegal (including drug sale/use, violence or threatened violence and criminal damage against property)
- In breach of Commonwealth or State legislation
- Unethical (representing a breach of Northcott's code of conduct)
- other serious improper conduct
- an unsafe work practice
- any other conduct which may cause financial or non-financial loss to Northcott or be otherwise detrimental to the interests of Northcott. **Whistleblower:** A person who, acting in good faith, reports conduct of the type outlined above to the Northcott officers identified in this policy and who explicitly claims whistleblower status. Such a complaint must be made in a formal manner and must be documented either by the whistleblower or the person receiving the complaint.
- For other definitions, please refer to Northcott Policy Dictionary.

Legislation:

- This policy and procedure was developed in accordance with the National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018.
- For other Legislation and Standards Compliance, refer to the Service Management Policy.

Authorised by:



Liz Forsyth, Chief Executive Officer

Subject Matter Expert: People and Culture \ HR		Version: 0.5
Issue Date: 3 February 2021	Next Review Date: 3 February 2024	Page 6 of 6