

WHISTLEBLOWING POLICY



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STATEMENT OF POLICY

Workers and employers engaged by LiteHaus International are entitled to certain protections if they make a disclosure in the public interest regarding their employer's or a third party's actions. LiteHaus International will not tolerate improper conduct by employees, volunteers or members of the Board or Committees. It will recognise the value of transparency and accountability in administrative and management practices and will support the making of disclosures of reportable conduct by whistleblowers. A person considering making a whistleblower report is obliged to act in good faith and have reasonable grounds for believing the disclosure is of reportable conduct. This policy is intended to apply to reports of wrongdoing which are serious in nature.

INTRODUCTION

A whistleblowing policy helps to show the employer's commitment to transparency, encourages workers to come forward with any concerns and allows for earlier disclosure which may result in the matter being dealt with before it gets too serious or causes reputational damage. It is important that there is clarity across the organisation of how to handle issues relating to whistleblowing so there is a consistent, effective and compliant approach to the process. LiteHaus International is committed to upholding values and ethical work practices in accord with its policies and legal obligations. To facilitate these values and ethical work practices, a whistleblower provision enables the reporting of reportable conduct and the protection of individuals who conscientiously make such disclosures.

SCOPE

If reportable conduct is observed, an employee, volunteer, vendor or member of the Board or a Committee who reports such behaviour must feel secure if or when such a conduct is reported by them. LiteHaus International supports individuals ("whistleblower") who act responsibly in this manner and who attest to the importance of values in our dealings at work.

To encourage the reporting, as required, of anyone suspected of serious misconduct including fraud, corruption, illegal activities, gross mismanagement or any other serious wrongdoing. Notwithstanding LiteHaus International's not-for-profit status, to give effect to the spirit of relevant whistle-blowing legislation that prohibits public sector organisations or publicly listed companies from taking adverse employment action against an employee because of their protected whistleblower activities. Some disclosures may involve concerns or conduct which does not amount to reportable conduct under this Policy. In these cases, the employee will be redirected to other appropriate policies and procedures which may assist employees or volunteers.

The specific principles inherent in actions taken to resolve the concerns of a whistleblowing complaint which align to the values and ethical work practices of LiteHaus International include:

- Awareness of workplace inadequacies or injustices and responding appropriately;
- Acting responsibly and being accountable for the use of resources; exercising responsible stewardship;
- Knowing, understanding and respecting the physical and emotional boundaries of adults and young people
- Promoting proper working conditions characterised by justice and fairness.

ACTIONS

LiteHaus International will ensure where practicable that no adverse employment action will be taken by the organisation against those who disclose reportable conduct in good faith. All reasonable steps will be taken to protect persons who make such disclosures from any adverse employment action by their employer, colleagues or workplace as a result of making the disclosure. A Whistleblower must not be subjected to any actual or threatened retaliatory action or victimisation in retaliation for making a disclosure of reportable conduct under this policy.

A Whistleblower must provide information that may assist any inquiry or investigation of the wrongdoing being disclosed. Analysis of all whistleblower disclosures will be undertaken. Relevant assessment of the underlying process will be reviewed and modified if deemed appropriate.

LiteHaus International will afford natural justice to the person who is the subject of a “whistleblower” disclosure of reportable conduct.

Whistleblowers should report incidents to incidentreporting@litehausinternational.org or directly to the CEO (or the Chair of the Board of Directors if the incident concerns the CEO). If the report contains allegations or reportable conduct against someone in an influential position, including a Director, the CEO or someone else, and the Whistleblower has a reasonable belief that this avenue would not be sufficiently independent, the Whistleblower should use the external whistleblower service provided.

CONSEQUENCES

The right of a whistleblower for protection under this Policy does not apply where the “Whistleblower” was complicit in the wrongdoing or any other misconduct.

Appropriate disciplinary actions may be taken against any staff member as a result of investigations into the conduct which is reported under this Policy being substantiated. LiteHaus International will also ensure that:

- each disclosure is appropriately inquired into and investigated by either an internal or external person who is independent and qualified;
- action taken in response to an inquiry or investigation is appropriate; and
- retaliatory action has not been taken against the person who made the disclosure.

An employee or volunteer who makes a frivolous or vexatious allegation or who clearly files a false report of wrongdoing, may be the subject of disciplinary actions up to and including the possibility of their services being terminated or cessation of a client relationship.

Where an employee or volunteer who is a Whistleblower is implicated in the wrongdoing, he or she will not be protected from the consequences flowing from involvement in the wrongdoing itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this Policy.

DEFINITIONS

- **Adverse Employment Action:** is employment action which personally disadvantages a whistleblower by termination of employment, a reduction in the terms and conditions of employment, demotion or unfair or unequal treatment in the workplace.
- **Child:** is a person under the age of 18 years.
- **Vulnerable Adult:** is any individual aged over 18 years who has or is suffering bereavement, marriage breakdown or other such adversity making them in particular need of pastoral support, or a person with an intellectual disability, physical illness, mental illness or other impairment that makes it difficult for that person to protect themselves from abuse or exploitation.
- **Reportable Conduct:** is actual or planned conduct which the whistleblower reasonably and in good faith suspects is:
 - Serious improper conduct including fraudulent, corrupt, illegal, unethical conduct;
 - Conduct involving gross mismanagement or a substantial mismanagement of resources;
 - Repeated serious breaches of the policies and practices of LHI;
 - Conduct seriously jeopardising risk to workplace health and safety or the work environment;
 - Conduct involving sexual abuse, abuse, harm or misconduct in relation to children or adults; (*)
 - Suspicion regarding potential or actual sexual abuse, abuse, harm or misconduct in relation to children or adults; (*)
- **Whistleblower:** is an individual who reports certain types of wrongdoing, typically some form of dangerous or illegal activity that they have witnessed. In the workplace environment, this may mean they take steps to make senior management and/or the relevant industry authorities aware of the workplace wrongdoings.
- **Whistleblowing:** is the process by which a worker can make a disclosure which is in the public interest about wrongdoing by their employer or a third party without fear of repercussions from their employer.

* NOTE: In all cases where there is statutory mandatory requirement to report a wrongdoing or abuse/mistreatment of a child or client - for example, in child protection or disability services areas, or as a condition of public funding and contracts, those processes will be adhered to as part of this Policy.

RELATED DOCUMENTS

- LiteHaus International – Codes of Conduct