

Protected Disclosure (whistleblower) Policy

1. Policy Objective

This Policy is founded upon Villa Maria Catholic Homes' (VMCH) value principles.

The purpose of this policy is to provide a supportive working environment where wrongdoing within or by Villa Maria Catholic Homes can be raised without fear of retribution.

This is achieved by:

- (a) encouraging reporting of wrongdoing that is of legitimate concern;
- (b) providing safe reporting options to remove inhibitions that may impede disclosure of wrongdoing;
- (c) establishing procedures that enable:
 - (i) protection for those who disclose serious wrongdoing;
 - (ii) independent internal inquiry/investigation of disclosures made; and
 - (iii) resolution of the issue(s) identified.

This policy supports VMCH's Vision, Mission and Values by providing the framework for individuals to raise an alert about wrongdoing in a supported way that respects the rights and dignity of all parties.

2. Who does this policy apply to?

2.1. Villa Maria Catholic Homes

This Policy applies to Villa Maria Catholic Homes Limited (ABN 32 004 364 103) and all of its related bodies corporate.

2.2. Protected Disclosure Individuals

For the purposes of this Policy, a **Protected Disclosure Individual** includes anyone who is, or has been:

- (a) an employee, volunteer or officer (whether full time, part time, casual) of VMCH;
- (b) a supplier of goods or services to VMCH, or an employee (whether paid or unpaid) of such a person;
- (c) an associate of VMCH, such as a person with whom VMCH acts in concert;
- (d) a relative, dependent or spouse of an individual who otherwise constitutes a Protected Disclosure Individual under this section; and

- (e) any other person who is a Protected Disclosure Individual in accordance with applicable legislation, including the *Corporations Act 2001 (Cth)* (**Act**), from time to time¹.

2.3. Who qualifies for protection?

A person qualifies for protection under this Policy if:

- (a) they are a Protected Disclosure Individual; and
- (b) they have made a report of Disclosable Conduct directly to:
 - (i) an Eligible Recipient, Protected Disclosure Officer;
 - (ii) the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**) or another Commonwealth body prescribed by regulation;
 - (iii) a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower protections in the Act; or
 - (iv) a parliamentarian or journalist in accordance with the emergency and public interest disclosure provisions (set out at section 5.4 of this Policy).

3. Matters that should be reported

3.1. Disclosable Conduct

Disclosable Conduct means information that the Protected Disclosure Individual has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to VMCH. This includes conduct that:

- (a) is fraud, negligence, default, a breach of trust or breach of duty;
- (b) represents a danger to the public or financial system;
- (c) constitutes an offence against, or contravention of, a provision of any of the following:
 - (i) the [Act](#);
 - (ii) the [Australian Securities and Investments Commission Act 2001](#);
 - (iii) the [Banking Act 1959](#);
 - (iv) the [Financial Sector \(Collection of Data\) Act 2001](#);
 - (v) the [Insurance Act 1973](#);
 - (vi) the [Life Insurance Act 1995](#);
 - (vii) the [National Consumer Credit Protection Act 2009](#);

¹ A person may also be a Protected Disclosure Individual and eligible for protection under this policy in accordance with the provisions of the [Taxation Administration Act 1953 \(Cth\)](#).

- (viii) the [Superannuation Industry \(Supervision\) Act 1993](#); or
- (ix) an instrument made under an Act referred to at 3.1(i)-(viii) above;
- (d) constitutes an offence against any other law of the Commonwealth, State or Territory;
- (e) is prescribed by regulation;
- (f) is dishonest or corrupt, including soliciting, accepting or offering a bribe;
- (g) is improper behaviour relating to accounting or internal accounting controls;
- (h) constitutes a conflict of interest;
- (i) is materially or potentially damaging to VMCH's financial performance or reputation;
- (j) impedes internal or external audit processes;
- (k) is causing an unsafe workplace or unsafe work practices;
- (l) constitutes a substantial mismanagement of VMCH's resources;
- (m) is a breach of VMCH's Code of Conduct or other governance policies;
- (n) represents a substantial risk to the environment;
- (o) constitutes concealment of wrongdoing; or
- (p) is detrimental conduct or threatens to engage in detrimental conduct against someone who has made a report under this Policy.

A Protected Disclosure Individual can still qualify for protection under this Policy even if their report of Disclosable Conduct turns out to be incorrect.

3.2. Matters that are not covered by this Policy

A disclosure that is not about Disclosable Conduct will not qualify for protection under this Policy or the Act.

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser do not qualify for protection.

Personal work-related grievances concern a grievance about any matter in relation to the person's employment, or former employment which may have implications for the discloser personally, but which does not have significant implications for VMCH (or another entity), or relates to any Disclosable Conduct.

Personal work-related grievances include:

- (a) interpersonal conflicts with other employees;
- (b) decisions relating to engagement, transfer or promotion of the Protected Disclosure Individual;
- (c) decisions about the terms and conditions of employment of the Protected Disclosure Individual; or

- (d) suspension, termination or disciplinary decisions in relation to the Protected Disclosure Individual.

Employees or officers who believe that they have a personal work-related grievance should raise the matter in accordance with VMCH's Employee Grievance Procedure.

A disclosure involving a personal work-related grievance can still qualify for protection if:

- (a) the disclosure also includes information about misconduct or an improper state of affairs described at section 3.1 of this Policy;
- (b) the Protected Disclosure Individual suffers from or is threatened with detriment for making the report; or
- (c) the Protected Disclosure Individual seeks legal advice or legal representation about the operation of the whistleblower protections under the Act (even if the legal practitioner concludes that the disclosure does not involve Disclosable Conduct).

4. Who can receive a report of Disclosable Conduct?

4.1 Protected Disclosure Officer

VMCH has designated specific people to receive Protected Disclosure Individual complaints. These people are known as the Protected Disclosure Officer/s.

A Protected Disclosure Individual may report Disclosable Conduct to the Protected Disclosure Officer.

The Protected Disclosure Officer has received training in dealing with disclosures under this Policy and their role is to protect and safeguard the rights and interests of Protected Disclosure Individual and ensure the integrity of reporting mechanisms under this Policy.

An individual may contact the Protected Disclosure Officer/s to seek accurate and confidential information and advice in relation to this Policy including information about how to make a report of Disclosable Conduct.

The contact details, hours of availability and instructions for making a report to the Protected Disclosure Officer/s are set out at Appendix A of this Policy.

4.2 Eligible Recipients

In addition to the Protected Disclosure Officer, the following people are **Eligible Recipients** under the Act who can receive disclosures of Disclosable Conduct that qualify for protection:

- (a) any officer (e.g. director or company secretary) or executive of VMCH; and
- (b) any internal or external auditor or actuary of VMCH.

The contact details, hours of availability and instructions for making a report to an Eligible Recipient is set out at Appendix A of this Policy.

4.3 Regulatory bodies

Reports may also be made to ASIC, APRA or to a prescribed Commonwealth authority in accordance with the Act.

4.4. Journalists or parliamentarians

A public interest disclosure or an emergency disclosure can also be made to a journalist (as defined by the Act) or a Member of Parliament of the Commonwealth, the Parliament of a State or the Legislature of a Territory (**parliamentarian**) in certain circumstances, as described at section 5.4 below.

4.5. Legal practitioners

If any person is concerned as to whether any disclosure they may seek to make in respect of Disclosable Conduct is covered by this Policy, that person may seek legal advice. Disclosing the information to a lawyer for the purpose of obtaining that legal advice or legal representation will not change the application of this Policy or the protection provided to any Protected Disclosure Individual under it (even in the event that the legal practitioner concludes that the disclosure does not relate to Disclosable Conduct).

5. How to report Disclosable Conduct

5.1. Matters to consider before reporting

A Protected Disclosure Individual who makes a report under this Policy must do so in good faith and only if they have reasonable grounds to suspect that Disclosable Conduct has occurred.

All Protected Disclosure Individual will be protected from reprisal for making the disclosure, as outlined in sections 6 and 7 of this Policy and the Act (even if those reports turn out to be incorrect). Further, all investigations into any reports made under this Policy (and in accordance with the Act) will be conducted in accordance with principles of fairness and natural justice.

A person who makes a false report knowingly, maliciously, with an ulterior motive, for personal gain or with reckless disregard as to the truth or falsity of the contents of the report will not be able to access the protections under this Policy. VMCH reserves the right to take appropriate action against persons who make such reports, including any disciplinary action.

While the VMCH acknowledges that Protected Disclosure Individuals may not have absolute proof or evidence of Disclosable Conduct, a report should, where possible, include the reasons for their concerns and make full disclosure of the relevant details of the conduct and supporting documentation.

5.2. Raising a concern internally

A Protected Disclosure Individual should in the normal course, first report Disclosable Conduct directly to the Protected Disclosure Officer or an Eligible Recipient.

5.3. Raising a concern externally

If a Protected Disclosure Individual is not comfortable disclosing Disclosable Conduct with the Protected Disclosure Officer or an Eligible Recipient, then the disclosure can be made to ASIC, APRA or any other authorised Commonwealth authority.

5.4. Emergency and/or public interest disclosure

In limited circumstances the law allows a Protected Disclosure Individual to make an **emergency disclosure** to a parliamentarian or a journalist. This applies where:

- (a) the matter has previously been reported to ASIC, APRA or a prescribed Commonwealth body in accordance with the Act or regulation;

- (b) the Protected Disclosure Individual has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- (c) the Protected Disclosure Individual provides written notice to the person or body to whom the initial disclosure was made under this Policy, that includes sufficient information to identify the previous disclosure and states that the Protected Disclosure Individual intends to make an emergency disclosure; and
- (d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

In addition to emergency disclosures, a Protected Disclosure Individual may also make a **public interest disclosure** to a Commonwealth, State or Territory member of Parliament or a journalist where:

- (a) at least 90 days have passed since the matter was reported to ASIC, APRA or a prescribed Commonwealth body in accordance with the Act or regulation;
- (b) the Protected Disclosure Individual does not have reasonable grounds to believe that action is being, or has been taken, in respect of that disclosure;
- (c) the Protected Disclosure Individual has reasonable grounds to believe that making a further disclosure of the information is in the public interest;
- (d) the Protected Disclosure Individual provides written notice to the person or body to whom the initial disclosure was made under this Policy, that includes sufficient information to identify the previous disclosure and states that the disclosure intends to make a public interest disclosure; and
- (e) the extent of the information disclosed in the public interest disclosure is no greater than is necessary to inform the recipient of the Disclosable Conduct.

If a Protected Disclosure Individual is unsure as to whether these provisions apply to any disclosure they have made (or intend to make), they are encouraged to raise the matter with either the Company Secretary & General Counsel of VMCH or to obtain their own legal advice.

Protected Disclosure Individual who make disclosures to parliamentarians or journalists that do not meet the conditions of an emergency or public interest disclosure do not qualify for the protections set out in this Policy in respect of those disclosures.

5.5. Anonymity

A Protected Disclosure Individual may elect to make a report anonymously and still be protected under the Act. The Protected Disclosure Individual can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. VMCH will protect anonymity of Protected Disclosure Individuals by:

- (a) allowing Protected Disclosure Individuals to use anonymised email addresses;
- (b) allowing Protected Disclosure Individuals to adopt a pseudonym for the purpose of their disclosure (for example, where the Protected Disclosure Individual's identity is known by the Eligible Recipient who received the report, but they do not wish to disclose their identity to others); and
- (c) allowing Protected Disclosure Individuals to report Disclosable conduct using paper-based letters.

6. Legal protections for Protected Disclosure Individuals

6.1. General

VMCH is committed to the protection of any Protected Disclosure Individual who makes a report in good faith under this Policy where they suspect that Disclosable Conduct may have occurred.

6.2. Confidentiality

When a person makes a disclosure, they are assured that every effort will be made to keep their identity confidential.

It is illegal for a person to identify a Protected Disclosure Individual, or to disclose information that is likely to lead to the identification of a Protected Disclosure Individual (which they have obtained directly or indirectly because the Protected Disclosure Individual made a disclosure that qualifies for protection), to any person who is not connected with the investigation into the Disclosable Conduct, except where:

- a) the disclosure is made to ASIC, APRA or a member of the Australian Federal Police;
- b) the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Act;
- c) the Protected Disclosure Individual who made the report consents in writing to the disclosure; or
- d) the disclosure is required by law.

This rule does not apply where the disclosure:

- (a) the disclosure does not include the Protected Disclosure Individual's identity;
- (b) the disclosure is reasonably necessary for the purposes of investigating the issues raised by the Protected Disclosure Individual; and
- (c) VMCH has taken all reasonable steps to reduce the risk that the Protected Disclosure Individual will be identified from the information.

6.3. Protection from detrimental acts or omissions

Protected Disclosure Individuals are protected under the Act from detriment arising from making a report of Disclosable Conduct.

A person must not engage in, or threaten to engage in, conduct which causes detriment to any Protected Disclosure Individual because that person proposes to, has or is suspected to have made, a report of Disclosable Conduct.

Where a disclosure of Disclosable Conduct is made, VMCH will take all reasonable steps to ensure that the Protected Disclosure Individual will not be personally disadvantaged or suffer any detriment including the following:

- a) dismissal or alteration of their position or duties to their disadvantage;
- b) injury to the person in their employment;
- c) discrimination, harassment or intimidation;
- d) harm or injury including psychological harm; or

- e) damage to the person or their property, reputation, business or financial position.

If any Protected Disclosure Individual considers that they have suffered any of the above disadvantages or detriment as a result of making a report of Disclosable Conduct under this Policy, they should contact the person to whom the report was made or a Protected Disclosure Officer and provide all relevant details accordingly. Should a Protected Disclosure Individual be found to have suffered detriment as a result of reporting Disclosable Conduct, VMCH will treat it as serious wrongdoing in accordance with the Managing Poor Performance and Unacceptable Behaviour Procedure.

6.4. Compensation and other remedies

A Protected Disclosure Individual can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage or injury because of making a disclosure of Disclosable Conduct; and
- b) VMCH failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

6.5. Civil, criminal and administrative liability protection

Any Protected Disclosure Individual who makes a report of Disclosable Conduct in accordance with this Policy has protection under the Act from:

- a) civil liability (e.g. legal action against the Protected Disclosure Individual for breach of a contractual obligation or duty of confidentiality);
- b) criminal liability (e.g. attempted prosecution for releasing information); and
- c) administrative liability (e.g. disciplinary action for making the disclosure),

in relation to the making of the disclosure.

These protections do not grant the Protected Disclosure Individual immunity for any misconduct the Protected Disclosure Individual has engaged in that may be revealed in their disclosure of Disclosable Conduct.

7. Support and Practical protections for Protected Disclosure Individuals

VMCH will support Protected Disclosure Individuals and protect them from detriment.

To maintain confidentiality of a Protected Disclosure Individual's identity, VMCH will:

- (a) ensure personal information or reference to the Protected Disclosure Individual's identity is redacted in all investigation and reporting documents;
- (b) refer to the Protected Disclosure Individual in a gender-neutral context;
- (c) ensure that all paper and electronic documents and materials relevant to the report of Disclosable Conduct will be stored securely, with access limited to those directly involved in managing and investigating the disclosure; and
- (d) the investigation of a report of Disclosable Conduct will be handled and investigated by staff that have undertaken investigations in the past.

VMCH will protect Protected Disclosure Individuals from detriment arising from making a report of Disclosable Conduct by:

- (a) conducting a risk assessment of the disclosure to manage the risk of detriment to the Protected Disclosure Individual; and
- (b) where applicable, making such reasonable adjustments as required to allow the Protected Disclosure Individual to perform their duties at work without being potentially exposed to detriment (e.g. by changing reporting lines or moving the Protected Disclosure Individual's desk to another location).

All Protected Disclosure Individuals are also able to access VMCH's Employee Assistance Program (**EAP**). Details for the EAP are available at Appendix A of this Policy.

8. Investigating a report

8.1. Procedure

Investigations into disclosures of Disclosable Conduct will be conducted by a designated investigator (**Protected Disclosure Investigation Officer**). The Protected Disclosure Investigation Officer will:

- a) document the report and determine whether it qualifies for protection under this Policy;
- b) determine whether a formal, in-depth investigation is required;
- c) if necessary, commence an investigation into the report, as soon as practicable after the matter has been reported;
- d) review all supporting documentation and obtain further information as required, including by interviewing individuals named in the report or relevant witnesses;
- e) consider any possible remedial action that may be required; and
- f) immediately notify the Company Secretary & General Counsel (or Chair of the Finance & Audit Committee, if the Company Secretary & General Counsel is in any way referenced in, or implicated by, the Disclosable Conduct) if the report relates to a serious matter, or if it becomes apparent during the investigation that there are matters of serious concern.

The purpose of any investigation under this Policy is to carefully, thoroughly and fairly examine each concern raised and where possible locate evidence that either substantiates or refutes the claims made in the report.

All investigations will be conducted without bias and all parties will be given adequate notice of meetings to discuss the issues raised and have time to prepare. All parties will be given the opportunity to be heard and will have the right to representation and any employee mentioned in a report of Disclosable Conduct will be treated fairly at all times.

In the interests of objectivity and the perception of objectivity, the Protected Disclosure Investigation Officer may engage other investigators in relation to an investigation (including independent external investigators). Further, in order to ensure proper process and to prevent actual or perceived unethical conduct, the offices of the Protected Disclosure Officer and Protected Disclosure Investigation Officer will not be held by the same person.

To avoid jeopardising an investigation, a Protected Disclosure Individual who has made a report under this Policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

It is important to note that VMCH may in certain circumstances not be able to undertake an investigation if it is unable to contact the Protected Disclosure Individual (e.g. if the disclosure is made anonymously and the Protected Disclosure Individual has refused to provide, or has not provided, a means of contacting them).

8.2. Progress and conclusion of investigations

Once an investigation is completed, the Protected Disclosure Investigation Officer will report the findings of the investigation to VMCH's Company Secretary & General Counsel who will report on all whistleblower incidents quarterly to the Finance & Audit Committee. For the avoidance of doubt, if the General Counsel is in any way referenced in, or implicated by, the Reportable Conduct, findings will be provided directly to the Chair of the Finance & Audit Committee.

If the Company Secretary & General Counsel (or Chair of the Finance & Audit Committee, as appropriate) is satisfied that Reportable Conduct has occurred, they will make a recommendation, to either the Chief Executive Officer or the Chair of VMCH, as to the action which should be taken. The findings of the investigation will also be reported to the Finance & Audit Committee.

8.3. Keeping the Protected Disclosure Individual informed

A Protected Disclosure Individual who has made a disclosure of Disclosable Conduct will, where appropriate, be regularly updated within a reasonable period of making the report:

- a) whether an investigation has been undertaken;
- b) whether the investigation has been completed; and
- c) what action is to be taken to address the Disclosable Conduct, subject to any applicable confidentiality, privacy and other relevant considerations.

For the avoidance of doubt, if a Protected Disclosure Individual has disclosed on an anonymous basis, VMCH may not be in a position to advise the Protected Disclosure Individual of the outcome of any investigation. A failure to notify feedback as a result will not of itself give rise to the basis of a public interest disclosure and VMCH will make every endeavour to contact Protected Disclosure Individuals through anonymous channels where necessary.

9. Individuals mentioned in a disclosure

VMCH will make every effort to ensure that natural justice and procedural fairness is afforded to a person mentioned in, or who is the subject of a report of Disclosable Conduct that qualifies for protection under the Act. Where an investigation does not result in a finding of Disclosable Conduct being made, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the disclosure or mentioned in the disclosure, will remain confidential.

The person who is subject to any disclosure or who is mentioned in a disclosure has the right to:

- a) be informed of any allegations made against them;
- b) be given the opportunity to answer any allegations made against them prior to any final decision being made; and
- c) access VMCH's EAP.

10. Availability of the Policy

A copy of this Policy will be made available on VMCH's intranet for internal staff, and will also be made publicly available for the reference of other stakeholders at VMCH's website – www.vmch.com.au

11. Support and Training

VMCH will periodically provide training and support to employees about this Policy and new staff inductions will include education about this Policy.

VMCH will also provide training and support to Protected Disclosure Officers and other Eligible Recipients who may receive disclosures of Reportable Conduct and how to respond to them in accordance with this Policy.

12. Amendment

The Company Secretary and General Counsel has overarching responsibility for maintaining and implementing this policy.

13. Related Policies and information

[Fraud and Corruption Policy](#)

[Conflict of Interest Policy](#)

[Gifts and Benefits Policy](#)

[Code of Conduct - Organisation Wide](#)

[Delegated Authorities Policy](#) (Previously Authority Delegation Schedule)

[Client Complaints Policy](#)

[Employee Grievance Procedure](#)

[Managing Poor Performance and Unacceptable Behaviour Procedure](#)

ASIC information sheet 238, [Whistleblower Rights and Protections](#)

ASIC Information Sheet 239, [How ASIC handles whistleblower reports](#)

Category 01 Governance & Leadership
Set Protected Disclosure
Owner Office of the CEO

Approved By Board of Directors
Approved Date 19/12/19
Review Date 19/12/22

Appendix A: Key organisational contacts

(Contacts last updated 14 January 2021)

Name	Role	Contact details	Further information
Company Secretary and General Counsel	Protected Disclosure Officer	9926 2499	Natalina.velardi@vmch.com.au
Legal Counsel	Protected Disclosure Investigation Officer		Stephanie.collins@vmch.com.au Amy.woods@vmch.com.au
Converge International	Employee Assistance Program	1300 687 327	The Hub - Employee Assistance Program Information
Eligible recipient contact details: a report can be made to the Eligible Recipients listed below by email or where listed by phone during business hours.			
Ms. Sonya Smart	Chief Executive Officer	9926 2000	Sonya.smart@vmch.com.au
Ms. Natalina Velardi	Company Secretary and General Counsel	9926 2499	Natalina.velardi@vmch.com.au
Mr. Chris Hilton	Chief Financial Officer		Chris.Hilton@vmch.com.au
Ms. Maria Paz	Chief Information Officer		Maria.paz@vmch.com.au
Mr. Rashmi Somu	General Manager People Services		Rashmi.somu@vmch.com.au
Ms. Bridget O'Shannassy	General Manager Mission		Bridget.oshannassy@vmch.com.au
Mr. David Williamson	General Manager Community & Disability Services		David.williamson@vmch.com.au
Mr. Voula Yankoulas	General Manager Residential & Retirement Services		Voula.yankoulas@vmch.com.au
Ms. Angela Roennfeldt	General Manager Property & Development		Angela.roennfeldt@vmch.com.au
Mr. Julien O'Connell AO	VMCH Board Chair		Julien.O'Connell@vmch.com.au
Ms. Anna Clarke	Director		Anna.Clarke@vmch.com.au
Mr. Brendan Donohoe	Director. Chair of the Strategic Projects Committee		Brendan.Donohoe@vmch.com.au
Mr. Michael Fisher	Director		Michael.Fisher@vmch.com.au
Ms. Sally Howe	Director. Chair of the Quality, Compliance and Risk Committee		Sally.howe@vmch.com.au

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Mr. Terry Janes	Director. Chair of the Finance and Audit Committee		Terry.Janes@vmch.com.au
Ms. Mary Power	Director		Mary.Power@vmch.com.au
Mr. Bob Santamaria	Director		Bob.Santamaria@vmch.com.au
Ms. Ro Saxon	Director		Ro.Saxon@vmch.com.au
Ms. Phoebe Shipp	Director		Phoebe.Shipp@vmch.com.au
Ms. Anneke Du Toit - Partner Deloitte	External auditors		adutoit@deloitte.com.au
Mr. George Kadis – Partner Moore Stephens	Internal auditors		gdakis@moorestephens.com.au

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