



Whistle-blower Policy

Purpose

The Whistle-blower policy is aligned to both AIRAH values and is one of several policies AIRAH supports in ethical and honest behaviour and to effectively manage and mitigate potential risk and cultural issues.

The policy supports and provides a safe and confidential environment for employees (including contractors, consultants, volunteers and former employees) to report wrongdoing, without fear of victimisation, reprisal, dismissal or discriminatory treatment.

What is “Wrongdoing”?

AIRAH is committed to maintaining ethical and honest behaviour in the workplace. If an employee genuinely believes in good faith and on reasonable grounds that wrongdoing has occurred, they are encouraged to report this. In reporting wrongdoing, employees should not be disadvantaged or victimised. AIRAH will endeavour to protect all employees making genuine reports of wrongdoing.

Wrongdoing can include but is not limited to:

- Dishonest, unethical, fraudulent or corrupt behaviour;
- Accepting or offering bribes, payments or other benefits;
- Committing fraudulent activities;
- Conduct causing damage to the reputation of the company;
- Breach of any legislation or regulation (including theft, drug sale and/or use and violence);
- Breach of internal policies;
- Inappropriate behaviour relating to accounting and audit matters;
- Concealment of wrongdoing;
- Unsafe work practices and/or behaviour that creates risk to health and safety;
- Any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to AIRAH.

Reporting

Employees are encouraged to report any wrongdoing that is in breach of the Whistle-blower or other AIRAH policies as well as AIRAH values. Where a report has been made in good faith, AIRAH will endeavour to protect the employee in accordance with the *Whistle-blowers Protection Act 2001* and prevent or act upon victimisation that may occur as a result. Should retaliation occur, AIRAH will treat it as serious wrongdoing under this policy and under the Equal Employment Opportunity Policy.

Reports of wrongdoing must be made to a minimum of 2 parties (2 people) as defined below:

- Wrongdoing concerning a fellow employee/s: A Manager and the CEO
- Wrongdoing concerning a member of the Leadership team: The CEO and the President of the Board of Directors
- Wrongdoing concerning the CEO: The President of the Board of Directors and a Member of the Board of Directors

Reports of wrongdoing should be in writing and where possible include, as appropriate, the following:

- The alleged breach;
- The person/persons alleged to be responsible for the breach;
- Facts which have led the employee to believe a breach has occurred;
- Further evidence that would support/substantiate the claim.

Anonymous Reports

Anonymous reports will be accepted in writing under this policy and can be made to the CEO or President of the Board of Directors. The person making the report must clearly state that they want their identity to be kept confidential during any investigation. However, AIRAH cannot guarantee anonymity in all cases. Anonymous reports will be handled consistent with the law and reporting requirements, and the identity of the individual making the claim will be kept confidential to the extent practicable permitted by law. Anonymous reports have limitations that may inhibit finding a resolution. Proper and appropriate investigations cannot occur due to an inability to gather additional information and this impacts AIRAH's ability to report back on progress and the outcome.

This policy operates in addition to the Equal Employment Opportunity and Grievances policies and does not replace the reporting procedures within it for resolving grievances regarding discriminatory, harassing or bullying behaviour.

Any wrongdoing reported may be investigated using the investigation procedure outlined below. **Any employee that reports wrongdoing must always maintain confidentiality.**

Investigating Procedures

Upon receiving a report of a breach, AIRAH will assess whether the claim is genuine, factual and unquestionably credible. If the claim is deemed to be in breach of this policy, AIRAH will nominate an internal officer, or external consultant to investigate.

All matters raised will be treated in a confidential, secure and sensitive manner and investigations will be conducted in accordance with the principles of procedural fairness and natural justice.

The principles of natural justice/procedural fairness include:

- ensuring the objectivity of the investigator;
- following a fair and proper procedure;
- acting based on logical proof and evidence when deciding;
- informing an individual of claims made against them;
- allowing them an opportunity to be heard and respond.

The process for investigation involves the following:

1. Defining the key issues to be investigated;
2. Defining the scope of the investigation including relevant questions to be asked, ensuring the scale of the investigation is proportionate to the seriousness of the allegation and ensuring enough and appropriate resourcing;
3. Analysing initial information and evidence relating to the claim;
4. Interviewing any individuals named to be in breach of the policy;
5. Interviewing relevant witnesses
6. Obtaining and examining further evidence;
7. Making a final determination as to whether the breach can be substantiated based upon findings of fact and evidence;
8. Developing a report outlining the allegations, relevant findings, the conclusion reached and recommendations to address the wrongdoing.

Interviews conducted during the investigation will, with authorisation, be taped and notes recorded. Employees reporting wrongdoing will be required to assist in the investigation process by providing any information necessary to assess the claims.

Breach

Any employee found to have engaged in wrongdoing or making a vexatious complaint may be subject to disciplinary action, up to and including termination of employment.

More information – Fair Work Act

Please refer to the following link for more information: [Fair Work - Protection at Work](#)