

PC-P003 WHISTLE-BLOWER POLICY

1.0 INTRODUCTION

- 1.1 This Whistle-blower Policy (“Policy”) details the framework for receiving, investigating and addressing allegations of Reportable Conduct (see section 7.0 for the definition of “Reportable Conduct”) where that Reportable Conduct concerns the activities of CORE Community Services (CORE) or present or former CORE Board member, staff, volunteer, contractor, supplier, tenderer or other persons who has business dealings with CORE. If this Policy differs from applicable law, CORE will apply whichever is more stringent.

2.0 PURPOSE

- 2.1 CORE is committed to fostering a culture of ethical behaviour and good corporate governance.
- 2.2 CORE will not tolerate any corrupt, illegal or other undesirable conduct by CORE Staff nor condone victimisation of an individual who intends to report or has reported such conduct as a Protected Disclosure in accordance with this Policy (see section 6.0 for definition of “Protected Disclosure”). CORE supports the reporting of improper conduct.
- 2.3 This Policy is designed to promote open communication throughout CORE, develop practices that reduce the risk of Reportable Conduct within the organisation, and safeguard the reputation, values and ethics of CORE.
- 2.4 The objectives of this Whistle-Blower Policy are to:
 - a) Provide any CORE staff, volunteer, contractor or client making an allegation of Reportable Conduct (“Whistle-blower”) with a clear framework within which to make that allegation as a Protected Disclosure.
 - b) Ensure any reports of Reportable Conduct are dealt with appropriately.
 - c) Provide Whistle-Blowers with a clear understanding of how allegations will be handled.
 - d) Protect Whistle-Blowers from victimisation and retaliation.
 - e) Support Whistle-Blowers throughout the reporting process.
 - f) Afford natural justice and procedural fairness to anyone who is the subject of an allegation of Reportable Conduct.

3.0 SCOPE

- 3.1 To support its stated objectives, this Policy provides a framework for Whistle-Blowers to make a Protected Disclosure by:
 - a) Providing reasonable protections for a Whistle-Blower who, acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true, raises concerns about Reportable Conduct (see section 7.0 of this Policy for examples).
 - b) Ensuring allegations of Reportable Conduct are properly and lawfully investigated and addressed.

4.0 RESPONSIBILITIES

- 4.1 The CORE Board is responsible for the development of this policy.
- 4.2 The People and Culture Manager and the Board are responsible for the monitoring of this policy and the activities outlined therein.
- 4.3 The CEO, Management Team and staff are responsible for adhering to this policy.

5.0 REFERENCES

[Corporations Act 2001 \(Cth\)](#)

[Education and Care Services National Law \(NSW\)](#)

[Education and Care Services National Regulations \(2011\)](#)

6.0 CORE COMMUNITY SERVICE WILL ENSURE:

- 6.1 That obligations under Corporations Act 2001 (Cth) are met.
- 6.2 That obligations under the Education and Care Services National Law [NSW] and National Regulations are met and child's safety and wellbeing are prioritised at all times.
- 6.3 All staff, students and volunteers have knowledge of and adhere to this policy and are advised on how and where the policy can be accessed.
- 6.4 All clients and families of our children's services preschool are aware of this *Whistleblower Policy* and are advised on how and where the policy can be accessed.
- 6.5 A safe environment is created where staff and volunteers feel supported reporting any wrongdoing.
- 6.6 A culture of transparency and integrity is promoted within the organisation.
- 6.7 Regular training and awareness sessions about whistleblower protections and processes are provided to all staff and volunteers.
- 6.8 Multiple reporting channels including internal and external options.
- 6.9 Appoint eligible recipients to receive disclosures.
- 6.10 Any whistleblower reports are promptly investigated.
- 6.11 Feedback is provided to whistleblowers on the progress and outcomes of their reports, where appropriate.

7.0 STAFF/VOLUNTEERS/STUDENTS WILL:

- 7.1 Immediately report all incidents, allegations and complaints relating to child safety to the approved provider (see: *Child Protection Policy*).
- 7.2 Cooperate with investigations into disclosures.
- 7.3 Maintain confidentiality about disclosures and investigations.
- 7.4 Support colleagues who make protected disclosures.
- 7.5 Not engage in or tolerate detrimental action against whistleblowers.
- 7.6 Complete required training on whistleblower protections and procedures.

8.0 CLIENTS, PARTICIPANTS AND FAMILIES WILL:

- 8.1 Be informed of their right to make protected disclosures about serious wrongdoing.
- 8.2 Have access to information about how to make a disclosure.
- 8.3 Be protected if they make a qualifying disclosure.
- 8.4 Have confidence that disclosures will be taken seriously and investigated appropriately.

9.0 PROTECTED DISCLOSURES

- 9.1 A "Protected Disclosure" is a report of Reportable Conduct made in accordance with this Policy. Nothing in this Policy is intended to retract or diminish any additional or alternative protections which may be available by law.
- 9.2 To be protected under this Policy, a Whistle-Blower must:

- a) be acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true;
 - b) make the disclosure in accordance with this Policy; and
 - c) not themselves have engaged in serious misconduct or illegal conduct in relation to the Reportable Conduct.
- 9.3 CORE promotes a culture that encourages the reporting of Reportable Conduct and where a Whistle-Blower makes a Protected Disclosure, that person will be protected from disciplinary action, victimisation, injury, alteration of an staff member's position, retaliation or claims by CORE as a result of having made the report.
- 9.4 The Whistle-Blower must, at all times during the reporting process, continue to comply with this Policy.
- 9.5 In circumstances where, for any reason, the identity of the Whistle-Blower is known outside of the investigation process, CORE will take reasonable steps to protect the Whistle-Blower from retaliatory or discriminatory action where it has sufficient authority to do so. CORE has no power to offer any person immunity against prosecution in the criminal jurisdiction or from any civil action which may be brought against the Whistle-Blower.
- 9.6 In some jurisdictions, in addition to the protections provided for under this Policy, a person making an allegation of Reportable Conduct may be protected by local law from civil and/or criminal proceedings, and, against retaliatory or discriminatory action as a result of having made an allegation protected by applicable local law.

10.0 REPORTABLE CONDUCT

10.1 What is reportable conduct?

- a) You may make a report under this policy if you have reasonable grounds to suspect that a present or former CORE Board member, staff member, volunteer, contractor, supplier, tenderer or other person who has business dealings with CORE has engaged in conduct (Reportable Conduct) which:
 - 1. Endangers or may endanger the safety, health or wellbeing of children.
 - 2. Inappropriate conduct toward children.
 - 3. Negligence.
 - 4. Systemic practices posing serious risk to health and safety.
 - 5. Breach of child protection requirements.
 - 6. Failure to comply with the National Law or Regulations.
 - 7. Is dishonest, fraudulent or corrupt, including bribery or other activity in breach of CORE's Policies.
 - 8. Is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law).
 - 9. Is unethical or in breach of CORE's policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching CORE's Code of Conduct or other policies or procedures).
 - 10. Is potentially damaging to CORE, a CORE staff member or a third party, such as unsafe work practices, environmental damage, health risks or abuse of CORE's property or resources.
 - 11. Amounts to an abuse of authority.
- b) May cause financial loss to CORE or damage its reputation or be otherwise detrimental to CORE's interests.

- c) Involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the *Corporations Act 2001 (Cth)* (Corporations Act).
- d) Involves any other kind of misconduct or an improper state of affairs or circumstances including any instruction to cover up or attempt to cover up serious wrongdoing.

10.2 This Policy extends to serious wrongdoing that occurs before or after the commencement of this Policy and is not limited to the above examples.

11.0 MAKING A REPORT

11.1 A Protected Disclosure may be made using the reporting channels outlined below.

- a) Internal Whistle-Blowers may use any of the following channels of communication to make a report:
 - I. verbally or in writing to their immediate Supervisor or Service Manager;
 - II. verbally or in writing to CORE
Email: whistleblowing@corecs.org.au
Phone: 02 8707 0609
 - III. in writing to the Board
 - IV. directly to the Independent Commission Against Corruption (ICAC) to make a report regarding misconduct relating or directly concerning Government contracts delivered by CORE:

Phone: 02 8281 5999 or freecall 1800 463 909 (callers outside Sydney)

In writing to: GPO Box 500 Sydney NSW 2001 or faxing 02 9264 5364

- V. directly to Australian Security Investment commission (ASIC) –Visit <https://asic.gov.au/complain> and follow the directions on making a report.

11.2 At any time, a staff member, volunteer, contractor or client who is unsure about whether to make a Protected Disclosure will be entitled to discuss the matter in confidence with their immediate supervisor or service manager. If the staff member is not comfortable in doing this, they may discuss in confidence with the People and Culture Manager.

11.3 In the event a Whistle-Blower does not formally make a Protected Disclosure, CORE may nevertheless be compelled to act on the information provided if that information reasonably suggests Reportable Conduct has occurred or may occur.

11.4 Aged care participants can also make a report via the following avenues:

- a) [The Aged Care Quality and Safety Commission](#)
- b) the department of Health, Disability and Aging, or an official of the department
- c) a registered provider
- d) a responsible person of a registered provider
- e) an aged care worker of a registered provider
- f) a police officer
- g) an independent aged care advocate

11.5 Reportable conduct regarding children may be made through the following avenues:

- a) NSW ECEC Regulatory Authority
1800 619 113 email: ececd@det.nsw.edu.au
- b) Independent Commission Against Corruption (ICAC)
1800 463 909 www.icac.nsw.gov.au
- c) NSW Ombudsman
1800 451 524 www.ombo.nsw.gov.au

11.6 Where the Whistle-Blower believes CORE's internal processes are inappropriate:

- a) The alleged Reportable Conduct involves the management of CORE, or
 - b) The Whistle-Blower considers the matter should not be referred to a supervisor, manager or People and Culture Manager, then
 - c) The Whistle-blower may make that report to the Chair of the Board or use the independent Whistle-Blower Service.
 - d) Or directly to the Independent Commission Against Corruption (ICAC) OR Australian Security & Investments Commission (ASIC).
- 11.7 The People and Culture Manager is entrusted to:
- a) Safeguard the interests of a Whistle-Blower.
 - b) Assess the immediate welfare and protection needs of a Whistle-Blower and, where the Whistle-Blower is a staff member, volunteer, contractor or client, seek to foster a supportive environment.
 - c) Respond as appropriate and necessary to any concerns or reports of victimisation by a Whistle-Blower.

12.0 PROTECTION OF WHISTLE-BLOWERS

- 12.1 CORE is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer detriment.

12.2 Protection against detrimental conduct:

- a) Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report under this Policy. If you are subjected to detrimental treatment as a result of making a report under this Policy you should:
 - I. inform the People and Culture Manager, Supervisors or Service Manager within your relevant Service immediately; or
 - II. raise it in accordance with section 8 “Making a Report” of this Policy.

12.3 Protection of your identity and confidentiality:

- a) Subject to compliance with legal requirements, upon receiving a report under this policy, CORE will only share your identity as a whistle-Blower or information likely to reveal your identity if:
 - 12.3.a.1 you consent in writing;
 - 12.3.a.2 the concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner or the Australian Federal Police (AFP); or
 - 12.3.a.3 the concern is raised with a lawyer for the purpose of obtaining legal advice or representation. If CORE needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk. Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

12.4 Protection of files and records:

- a) All files and records created from an investigation will be retained securely. Unauthorised release of information to someone not involved in the investigation (other than senior managers or Board members who need to know to take appropriate action, or for corporate governance purposes) without your consent as a Whistle-Blower will be a breach of this policy. Whistle-Blowers are assured that a release of information in breach

of this policy will be regarded as a serious matter and will be dealt with under CORE's disciplinary procedures [PC-P015 Managing Performance and Conduct](#).

13.0 CONSEQUENCES OF KNOWINGLY MAKING A FALSE REPORT

- 13.1 Anyone who knowingly makes a false report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including dismissal (in the case of staff) or professional conduct sanction (in the case of members).
- 13.2 The disciplinary action or sanction will depend on the severity, nature and circumstance of the false report.

14.0 CONFIDENTIALITY AND PRIVACY

- 14.1 CORE will make all reasonable efforts to ensure the identity of a Whistle-Blower remains confidential throughout the investigation process please see Section 9.3.1.
- 14.2 Whistle-Blowers can report anonymously. Any supervisor or manager who receives a Whistle-Blower report must not disclose that report to anyone other than the People and Culture Manager and if it is impossible to report the People and Culture Manager then the report should be made to the Chair of the of the Finance and Risk Committee .
- 14.3 Unauthorised disclosure of the Whistle-Blower's identity or information from which the identity of the Whistle-Blower could be inferred will be regarded as a disciplinary matter and will be dealt with in accordance [PC-P015 Managing Performance and Conduct](#).
- 14.4 Where a Protected Disclosure is made anonymously, CORE will use reasonable efforts to ensure the process of investigating the report does not lead to the Whistle-Blower being identified.
- 14.5 A Whistle-blower must keep all information relating to any allegation confidential at all times, both during any investigation process and following any resolution of an allegation.

15.0 INVESTIGATION

- 15.1 A Whistle-Blower's report may only be investigated and acted upon following referral to the People and Culture Manager or the Chair of the Finance and Risk Committee. Any other person (such as a supervisor or manager) who receives a report of Reportable Conduct must immediately refer it to the People and Culture Manager or the Chair of the Finance and Risk Committee, take no further action and keep the report confidential.
- 15.2 Once received, all allegations of Reportable Conduct pursuant to this Policy must be referred to the People and Culture Manager or the Chair of the Finance and Risk Committee and include, at a minimum, the following details:
 - a) the date the Whistle-Blower made the report;
 - b) the date and substance of the Reportable Conduct;
 - c) the identity and level of seniority of the alleged wrongdoer;
 - d) the level of risk associated with the alleged wrongdoing.
- 15.3 All Protected Disclosures will ultimately be reported to the Finance and Risk Committee, either as part of the Whistle-Blower Register, or as standalone agenda items in circumstances where the People and Culture Manager determines this is warranted or necessary.
- 15.4 The People and Culture Manager (or the Chair of the Finance and Risk Committee if applicable) will determine whether sufficient information exists to allow the report(s) to be investigated, whether an investigation is required, and, if so, determine the appropriate investigation process, including:
 - a) The nature and scope of the investigation.
 - b) Who will conduct the investigation and whether that person should be external to CORE.

- c) The nature of any technical, financial or legal advice that may be required.
 - d) A timeframe for the investigation (having regard to the allocated level of risk).
- 15.5 The Whistle-blower will, if CORE deems it appropriate and permissible to do so, be informed on a continuing basis as to the nature and progress of the investigation.
- 15.6 CORE may be required to refer an allegation of Reportable Conduct to the Police or other agency (e.g. Government Departments – where a breach of contract may have occurred).
- 15.7 In such circumstances it may not be able to keep a Whistle-blower informed on the progress of a Protected Disclosure.

16.0 INVESTIGATION FINDINGS

- 16.1 CORE will apply principles of procedural fairness and natural justice to the conduct of any investigation and resultant findings arising under this Policy.
- 16.2 The person leading any investigation will report their findings to the CEO (or directly to the Chair of the Finance and Risk Committee) if the CEO has been circumvented due to a conflict as contemplated by this Policy) and advise the recommended course of action (if any) that CORE should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of CORE.
- 16.3 The CEO and the Chair of the Finance and Risk Committee will determine the action (if any) to be taken. If appropriate, and subject to any applicable confidentiality, privacy or legal constraints, the People and Culture Manager may notify the Whistle-Blower of the conclusion of the investigation and the action taken.

17.0 RECORD KEEPING AND ACCOUNTABILITY

- 17.1 The People and Culture Manager is responsible for communicating this Policy to staff of CORE and otherwise ensuring maintenance and adherence to this Policy.
- 17.2 CORE will establish and maintain a record of all reports of Reportable Conduct received, the investigation process undertaken, and any actions taken to resolve the matter (“Whistle-Blower Register”).
- 17.3 The People and Culture Manager will:
- a) coordinate and support the impartial investigation of Protected Disclosures;
 - b) escalate Whistle Blower notifications to the Board as required;
 - c) submit a quarterly summary report to the Finance and Risk Committee, the chairperson will submit a copy of the quarterly report to the Board, which provides statistics of:
 - I. The number of reports received, per quarter.
 - II. For each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer and the level of perceived risk.
 - III. For each report, the time taken to investigate it.
 - IV. The conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).
- 17.4 The Chair of the Governance Committee shall periodically review the Whistle-Blower Register to ensure that proper processes are being followed.

18.0 VICTIMISATION

- 18.1 CORE is committed to ensuring that any person who reports Reportable Conduct, acts as a witness or participates in any way with respect to a report of Reportable Conduct is not victimised.

- 18.2 CORE will thoroughly investigate reports of victimisation. If proven, those who have victimised a person may be subject to management action (including disciplinary action or dismissal) [PC-P015 Managing Performance and Conduct](#).

19.0 SUPPORT

- 19.1 The CEO or the People and Culture Manager can initiate or coordinate support for staff who have or are in the process of making a report. As a first step, staff can contact CORE's employee assistance provider –ACCESSEap.
- 19.2 Information on how to contact ACCESSEap can be found at www.accesseap.com.au.

20.0 POLICY INFORMATION

- 20.1 This policy will be reviewed every 3 years and the review will include Management, staff and Interested Parties.

Contact Officer	People and Culture Manager
Document Owner	People and Culture Manager
Approval Authority	Board

Version	Version Changes	Date Approved	Approved By	Date of Next Review
V1	Document Created	9/04/2013	Board	2018
V2	Updated: Introduction, purpose, scope and responsibilities. Added the information under the following sub-headings: Protected disclosures, reportable conduct, making a report, consequences of making a false report, confidentiality and privacy, investigation, investigation findings, record keeping and accountability, victimisation and support.	01/05/2020	Board	01/05/2022
V3	Minor editorial changes	24/08/2022	Board	24/08/2025
V4	Added the requirements of the aged care commission changes.	29/10/2025	Board	29/10/2028
V5	Added Changes required by the Education and Care Services National Law (NSW) Education and Care Services National Regulations (2011)	19/11/2025	People and Culture Manager	19/11/2028