

1 Purpose

- 1.1 The Hume Group is committed to a culture of accountability and integrity through implementation of systems that support transparent decision making, ethical behaviour and good governance.
- 1.2 In addition, the Hume Group's values also guide our behaviour and are set out in the Code of Conduct policy. Through demonstration of our values, we create the work environment that welcomes employees to speak up on things they feel aren't right and be heard free from repercussion.

The purpose of this policy is to ensure that the Hume Group:

- Promotes the responsibility of the Hume Group's directors, employees, consultants, contractors and any other parties acting as representatives or agents of the Hume Group to report inappropriate conduct within the organisation;
- Provides employees, suppliers and their families with an avenue for reporting inappropriate conduct;
- Outlines the channels through which inappropriate conduct can be reported;
- Encourages employees and representatives to report inappropriate conduct by emphasising the protections offered to those who do so; and
- Ensures that inappropriate conduct is detected, addressed appropriately and prevented in the future.

2 Scope

- 2.1 This policy applies to all Hume Group directors, employees, consultants, contractors and volunteers. It extends to suppliers and relatives of employees and contractors who make disclosures which trigger whistleblower protections.
- 2.2 The Hume Group is committed to regular review of the whistleblower program to ensure its effectiveness.

3 Policy

- 3.1 The Hume Group is committed to creating and maintaining a values'-based and open working environment in which employees, directors, consultants, contractors, suppliers and volunteers can raise concerns regarding unethical, unlawful or undesirable conduct, known as 'Reportable Conduct' without fear of reprisal.
- 3.2 The Hume Group encourages reporting these suspicions to ensure the organisation can swiftly and appropriately address any confirmed issues, continues to improve and continues to deliver services fairly and equitably.

3.3 This policy is intended to cover concerns that are in the public interest and may at least initially be investigated separately but might then lead to the commencement of other procedures, e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or statutes;
- Dangers to health and safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour; and
- Attempts to conceal any of these.

3.4 The Hume Group provides a completely independent, external disclosure option for reporting such concerns. Concerns may also be raised informally via internal reporting lines and/or People and Culture.

Please note that if an individual is found to deliberately make malicious or vexatious allegations, disciplinary (including termination) and/or other legal action may be taken against that individual.

[Notification to the Registrar of Community Housing](#)

If the incident is a notifiable incident as determined by the Registrar of Community Housing and outlined in the [Notifiable Incidents to Registrar Policy and Procedure](#) - is also to be followed.

4 References

This policy should be read in conjunction with:

- Whistleblower and Employee Disclosure Procedure
- Employee Grievance Policy & Procedure
- Employee Separations Policy & Procedure
- Notifiable Incidents to Registrar Policy & Procedure
- Code of Conduct Policy

- Hume Group Charter

5 Definitions

Hume means Hume Community Housing Association Company Limited.

Hume Group means the corporate structure that includes Hume and Subsidiaries as created from time to time.

Parent Board means the current directors of Hume.

Subsidiary means a company in which Humes is the sole member or owns all or at least a majority of the shares.

6 References

National Employment Standards
 Fair Work Australia
 Corporations Act 2001

7 Responsibilities

7.1

Role or responsibility	Position or delegation level
Developing the process for this policy	Head of Strategy, Transformation and Engagement
Ensuring policy aligns with compliance obligations	Head of Strategy, Transformation and Engagement
Approving Policy	People and Culture Committee of the Parent Board
Implementation	All employees
Policy review	Every 3 years

8 Approval and Review Details

Approval and Review	Details
Approval Authority	People and Culture Committee of the Parent Board
Policy Owner	Head of Strategy, Transformation and Engagement
Next Review Date	August 2025
Policy History	Details
Original Approval Authority and Date	Board 22/02/2012
Amendment Authority and Date	23/02/2024 - V 0002 – Minor changes approved by CEO in accordance with the Delegations of Authority Policy V0011 and amended to apply to the Hume Group.