

## 1 Purpose

- 1.1 This procedure supports the [Whistleblower and Employee Disclosure Policy](#) which is designed to ensure that honesty and integrity are maintained at the Hume Group. It is intended to encourage and enable employees and others to raise serious concerns internally so that the Hume Group can address and correct inappropriate conduct and actions.

## 2 Procedure

### 2.1 Whistleblower Reporting Procedures

Hume Group provides a completely independent, external disclosure option through Weir Consulting (National) (**WEIR**). WEIR are an independent service provider engaged to operate a Whistleblower hotline and reporting service for the Hume Group. The operators receiving calls on this hotline are not associated with the Hume Group.

Anyone who has reasonable grounds to suspect that malpractice or misconduct has occurred is encouraged to raise the concern directly with the Whistleblower Service on this reporting link [Hume Whistleblowing Complaints](#), by email to [Humewhistblower@weirconsult.com.au](mailto:Humewhistblower@weirconsult.com.au) or by phone on 02 8401 9122.

WEIR can also be contacted for further information about protected disclosures, whistleblowing and how this policy works, as well as concerns about a breach of confidentiality in relation to this policy.

Any person who is not an employee of the Hume Group and has reasonable grounds to suspect that malpractice or misconduct has occurred is encouraged to report that suspicion directly to the Whistleblower Service above.

Disclosures to eligible recipients as identified in this procedure may also be made.

All claims of malpractice or misconduct should provide specific, adequate and pertinent information with respect to, amount other things, dates, places, persons, witnesses, amounts and other relevant information, in order to allow for a reasonable investigation to be conducted. If the whistleblower discloses his or her name, the person receiving the claim will acknowledge having received the complaint and may initiate a follow-up meeting. However, if the claim is submitted on an anonymous basis, there may not be an ability to communicate with the whistleblower if more information is required, or if the matter is to be referred to external parties for further investigation. You are encouraged to use WEIRS two-way communication options if choosing to remain anonymous.

### 2.2 Procedures Following Disclosure

Once a report has been received from a whistleblower, the claim will be assessed and where necessary, may proceed to investigation or other enquiries made.

Assessment usually takes around two weeks, and if contact information is provided the whistleblower will be advised regarding next steps.

Where the matters raised require referral to the Police or other regulator such as ASIC, Hume Group will do so at the earliest opportunity.

## 2.3 Investigations

Where required, investigations may be carried out internally or by an external party, as appropriate.

Investigations will be conducted promptly and fairly with due regard to the nature of the allegation and the rights of the people involved in the investigation. Hume Group recognises the importance of balancing the rights of the whistleblower and the rights of the individuals against whom a report is made.

It may be necessary during the investigation to obtain further information from the person who raised the concern. In this case a meeting will be arranged, and the employee is entitled to have an advocate or support person present, this may be a union representative.

Should the report be deemed not to be a protected disclosure / reportable conduct matter then any ensuing investigation will follow Hume Group's relevant internal policy and procedure.

The target timeframe for investigation is within 12 weeks following referral for investigation.

## 2.4 Reporting

At the conclusion of the investigation, the investigator will prepare a report for Hume Group. If the final report indicates malpractice or misconduct has occurred, the final report will include recommendations for steps to be taken to prevent the malpractice or misconduct from occurring in the future. It will also outline any action that should be taken to remedy any harm or loss arising from the malpractice or misconduct. This may include disciplinary proceedings against the person responsible for the conduct, and the referral of the matter to appropriate authorities, as is deemed necessary by the CEO or board member.

## 2.5 Communications with the Whistleblower

The Hume Group will ensure that, provided the claim was not submitted anonymously, the whistleblower is kept informed of the assessment of the complaint, steps taken, and where undertaken, the outcomes of any investigation, subject to privacy and confidentiality requirements.

If the whistleblower is not an employee of the Hume Group, the whistleblower will be kept informed of the investigative outcomes (subject to the privacy considerations as above), once the whistleblower has agreed in writing to maintain confidentiality in relation to any information provided to them regarding a report made by them.

### 3 Related policies and documents

The Hume Group has other policies that may be suited to specific concerns of employees or contractors. Please also carefully consider the:

- 3.1 [Policy & Procedure – Grievance](#)
- 3.2 [Policy & Procedure - Notifiable Incidents to Registrar](#)
- 3.3 [Policy & Procedure: Bullying, Harassment and Discrimination](#)
- 3.4 [Policy - WHS](#)

Where other policy coverage is relevant, complaints may be assessed as requiring escalation and management under that policy. Interpersonal concerns and conflict, or issues arising from performance management will generally not be covered by this policy.

Further, personal, work-related grievances are generally excluded from protections offered to whistleblowers. See [section 1317AADA of the Corporations Act 2001](#) for further information.

### 4 General Principles

This policy is designed to ensure that honesty and integrity are maintained at the Hume Group. It is intended to encourage and enable employees and others to raise serious concerns internally so that Hume Group can address and correct inappropriate conduct and actions.

An [eligible whistleblower](#) with a valid complaint is protected against adverse employment actions (dismissal, demotion, suspension, harassment, or other forms of discrimination), [victimisation](#) or [detrimental action](#) for raising allegations of malpractice, misconduct or conflicts of interest. A whistleblower will also not be subject to any civil, criminal or administrative liability for making the disclosure. Subject to this policy, a whistleblower is protected if they had a genuine belief the conduct occurred, even if the allegations prove to be incorrect or unsubstantiated. In addition to disclosures under this policy, there are other disclosures that may qualify for whistleblowing protection, such as to ASIC, APRA or other prescribed bodies. See sections [1317AB \(linked\)](#) and [1317AA of the Corporations Act 2001 \(linked\)](#) for further information.

Employees who participate or assist in an investigation will also be protected. This will include communications of rights and responsibilities to anyone who makes or is affected by a whistleblowing complaint, suspension or alternative work directions and clear warnings against reprisal and victimisation. Hume Group will take disciplinary action against anyone who causes detriment to someone who has made or is suspected of having made a whistleblower complaint.

ASIC provides detailed, useful information for anyone considering a complaint. Refer to the [ASIC information sheet on Whistleblower rights and protections](#).

### 5 Protection of a Whistleblower

#### 5.1 When the policy will operate

This policy will operate when an **eligible whistleblower** discloses **reportable conduct** described in this policy or a **Disclosable matter** to an **eligible recipient** and in circumstances where the whistleblower has reasonable grounds to suspect that the reportable conduct relates to the Hume Group and the discloser has reasonable grounds to suspect that the information concerns misconduct, or an improper state of affairs or circumstances.

## 5.2 Who is an eligible whistleblower?

An **eligible whistleblower** may be an individual who is or has been any of the following:

- An employee or officer of the Hume Group (or former in some cases);
- A supplier of goods or services to the Hume Group whether paid or unpaid (or one of their employees);
- An associate of the Hume Group including a director or company secretary; or
- A relative, dependent or spouse (or the dependent of the spouse) of any of the individuals listed above.

## 5.3 What is a protected disclosure / reportable conduct?

Information provided by a whistleblower will be reportable conduct if the whistleblower has reasonable grounds to suspect that information being disclosed concerns misconduct, or an improper state of affairs in relation to the Hume Group.

Below are some examples of reportable conduct:

- a) Dishonesty
- b) Fraud
- c) Corruption and influence peddling
- d) Criminal illegal activities (including but not limited to theft, drug sale/ use, violence or threatened violence and criminal damage against Hume Group property)
- e) Discrimination, vilification, sexual harassment, bullying and victimisation not properly managed or addressed under Hume Group's policy;
- f) Acts or omissions in breach of Commonwealth or State legislation or local authority by-laws;
- g) Unethical behaviour;
- h) Other serious improper conduct
- i) Any other conduct which may cause financial or non-financial loss to the Hume Group or be otherwise detrimental to the interests or reputation of the Hume Group or any of its employees; or
- j) The deliberate concealment of information tending to show any of the matters listed above.

Reportable conduct usually relates to the conduct of the Hume Group and its employees, but it can also relate to the actions of a third party, such as a customer, supplier, service provider or contractor.

Conduct which is not related to the affairs of the Hume Group and is purely private in nature, is not a reportable matter. Some out-of-hours conduct may still be related to the affairs of the Hume Group if it is conduct which is capable of seriously impacting their reputation, standing or finances.

Conduct which is a personal work-related grievance is not a reportable matter under the policy. A personal work-related grievance may include:

- An interpersonal conflict between the discloser and another employee;
- A decision relating to the engagement, transfer or promotion of the discloser;
- A decision relating to the terms and conditions of engagement of the discloser; and
- A decision to suspend or terminate the engagement of the discloser or otherwise to discipline the discloser.

Other protections may be available for some types of complaints, such as under the Fair Work Act 2009 or various protections under anti-discrimination law. For information relating to these types of grievances, please refer to the Grievance Policy.

## 6 Eligible Recipients

For the purpose of this policy, an [eligible recipient](#) to which disclosures of reportable conduct may be made are:

- Weir Consulting (National) – preference is that you use this external independent complaint handling service, who are authorised by Hume Group [Hume Whistleblowing Complaints \(linked\)](#)
- A member of the Parent Board
- A member of the Executive Leadership Team
- An external auditor engaged by Hume Group or a member of the audit team
- Australian Securities and Investments Commission (ASIC) or another Commonwealth regulator
- Through a legal representative

Whistleblowers are encouraged to raise concerns with WEIR in the first instance where possible and appropriate to do so.

## 7 Other channels for making a disclosure

There may be circumstances where a whistleblower can make an external disclosure (including emergency or public interest disclosures to a parliamentarian or journalist). Prior to making a disclosure in these circumstances, it is recommended that an eligible whistleblower obtains independent legal advice.

### 7.1 Whistleblower protections

The Hume Group is committed to ensuring confidentiality in respect of matters raised under this policy, and that those who make a report are treated fairly and do not suffer detrimental treatment.

### *Protection against detrimental treatment*

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a disclosure.

The Hume Group will endeavour to ensure that eligible whistleblowers are not subjected to detrimental treatment as a result of making a disclosure under this policy. If an eligible whistleblower believes that they have been subject to detrimental treatment, they should inform an authorised recipient immediately. Action will be taken to protect and discipline in the event it occurs.

### *Protection of identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a disclosure under this policy, the Hume Group will only share the identity of an eligible whistleblower or information likely to reveal their identity if:

- They consent;
- The concern is reported to ASIC, the Australian Prudential Regulation Authority, the Tax Commission or the Australian Federal Police; or
- The concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Hume Group needs to investigate a disclosure, it may disclose information that could lead to the identification of the eligible whistleblower but will take reasonable steps to reduce that risk.

Any disclosures likely to reveal the identity of a whistleblower will be made strictly on a confidential basis.

### *Anonymous Disclosure*

Disclosers are also able to make a completely anonymous complaint through Weir Consulting (National) using the reporting link or hotline.

You are able to remain anonymous while making a disclosure, over the course of the investigation and once the matter is finalised should you wish to do so. If you choose to remain anonymous, WEIR can provide two way communication options and establish an email on your behalf, provide links for upload and download of materials and also provides a number you can call to discuss your complaint without identifying yourself.

### *Other protections*

In addition to the above, eligible whistleblowers may be entitled to additional legal protections in certain circumstances, including:

- Protection from civil, criminal or administrative legal action for making a disclosure;
- Protection from contractual or other remedies being sought, and contractual rights being exercised on the basis of the disclosure. In addition, a contract to which a whistleblower is a party cannot be terminated because of the disclosure;

- The information provided as part of raising a concern may not be admissible in evidence against a whistleblower in legal proceedings (unless they have provided false information); and
- If a whistleblower is subject to any retaliatory or detrimental conduct for speaking up, in some circumstances, they may be entitled to compensation or another remedy.

## 8 Public Interest Disclosures

In addition to the matters set out in the policy, all employees and officers of the Hume Group are entitled to the protections contained in the Public Interest Disclosure Act 2013 (Cth) if a public interest disclosure is made. A public interest disclosure may arise where an allegation relates to misconduct or improper behaviour that is in connection with the entering into or the giving effect of a contract for the supply of goods and services to the Commonwealth. This may occur where the allegations are interrelated with Federal Government funding or benefits in the provision of services by the Hume Group.

## 9 Definitions

**CEO** means Chief Executive Officer of the Hume Group appointed by the Parent Board.

**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 Hume is the sole member or owns all or at least a majority of the shares.

## 10 Responsibilities

9.1

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

## 11 Approval and Review Details

Approval and Review	Details
Approval Authority	Head of Strategy, Transformation and Engagement

Approval and Review	Details
Policy Owner	Head of Strategy, Transformation and Engagement
Next Review Date	23/02/2027
Policy History	Details
Original Approval Authority and Date	21/02/2012
Amendment Authority and Date	<p>12/09/2022 – V004 this version of the Whistleblower &amp; Employee Disclosure Procedure replaces Version 003 dated 21/08/2018.</p> <p>23/02/2024 - V 0005 Minor changes were approved by CEO in accordance with the Delegations of Authority Policy V0011 and amended to apply to the Hume Group.</p>