



BCR Communities

Whistleblower Policy



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1 POLICY STATEMENT

- 1.1 Bay & Basin Community Resources Limited/BCR Communities (BCR) is committed to conducting their operations with honesty, fairness and integrity and to addressing and investigating reported misconduct and rectifying proven wrongdoing.
- 1.2 The Whistleblower Policy has been developed and implemented to encourage the reporting of wrongdoing within the organisation and supports this through the promotion of a workplace free of unacceptable behaviour and serious misconduct.
- 1.3 This policy is endorsed by BCR's Executive Team and Board of Directors (the Board) to ensure it supports simple and clear reporting and resolution processes in response to the identification of illegal, inappropriate or unethical conduct.

2 PURPOSE

- 2.1 The purpose of our whistleblower policy is to:
 - 2.1.1 encourage disclosures of wrongdoing,
 - 2.1.2 help deter wrongdoing, in line with our risk management and governance framework,
 - 2.1.3 ensure individuals who disclose wrongdoing (disclosers) can do so safely, securely and with confidence that they will be protected and supported,
 - 2.1.4 ensure discloser's reports (disclosures) are dealt with appropriately and on a timely basis,
 - 2.1.5 provide transparency around our process for receiving, handling and investigating disclosures,
 - 2.1.6 support our values and code of conduct,
 - 2.1.7 support our long-term sustainability and reputation, and
 - 2.1.8 meet our legal and regulatory obligations.
- 2.2 If we are to achieve this purpose, it is important anyone who is aware of possible wrongdoing have the confidence to speak up knowing that they are fully supported by BCR and the whistleblower legislation.

3 SCOPE

- 3.1 This policy applies across all of BCR and to anyone who reports any wrongdoing by BCR, its Directors, workers and/or suppliers.

4 WHO QUALIFIES FOR PROTECTION UNDER THE CORPORATIONS ACT?

- 4.1 A discloser qualifies for protection as a whistleblower under the [Corporations Act 2001 \(Cth\)](#) if they are an eligible whistleblower and:
- 4.1.1 they have made a disclosure of information relating to a 'disclosable matter' directly to an 'eligible recipient' (see below, who can receive a disclosure) or to [Australian Securities and Investment Commission](#) (ASIC), the [Australian Taxation Office](#) (ATO), the [Australian Prudential Regulation Authority](#) (APRA) or another Commonwealth body prescribed by regulation,
 - 4.1.2 they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the [Corporations Act 2001 \(Cth\)](#), or
 - 4.1.3 they have made an 'emergency disclosure' or 'public interest disclosure' (refer to clauses 7.8.3, 7.9 and 9.1 for more information).

5 MATTERS THE POLICY APPLIES TO

- 5.1 BCR's Whistleblower policy applies to disclosable matters such as conduct by BCR, its workers or a contracted service provider that contravenes a law, is corrupt or constitutes maladministration, results in wastage of public money or property, or is an abuse of public trust.
- 5.2 It covers the following types of wrongdoing:
- 5.2.1 physical, psychological or other abuse of a consumer of our service,
 - 5.2.2 receiving gifts or monies from a consumer of our service without the permission of a senior manager,
 - 5.2.3 illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property,
 - 5.2.4 fraud, money laundering or misappropriation of funds,
 - 5.2.5 offering or accepting a bribe,
 - 5.2.6 financial irregularities,
 - 5.2.7 failure to comply with, or breach of, legal or regulatory requirements, and
 - 5.2.8 engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

- 5.3 Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law.
- 5.4 A discloser will not be penalised if a matter raised by them ultimately turns out to be incorrect, provided that the disclosure was made with genuine belief regarding a disclosable matter. However, discloser must not make a report that they know to be untrue or misleading. Where it is found that the whistleblower has made a false report, this will be considered a serious matter and, if they are a BCR worker, it may result in disciplinary action in accordance with BCR's policies and procedures.

6 MATTERS THE POLICY DOESN'T APPLY TO

- 6.1 Staff and volunteer grievances are not included as part of the whistleblower procedure, they should be raised in accordance with BCR policies related to the grievance to allow those issues to be resolved most effectively. Staff and volunteers can refer to BCR's Grievance Policy for more information about reporting grievances.
- 6.2 Complaints about service delivery are also excluded and are managed through the consumer complaints process. More information about making a complaint can be found on BCR's website.
- 6.3 Unauthorised disclosures are also excluded. As they contain information that BCR or its officers are not authorised to access, they are not disclosable matters.

7 WHO IS AN ELIGIBLE RECIPIENT OF A DISCLOSURE

- 7.1 BCR has identified below the 'eligible recipients' who can receive disclosures that qualify for protection of the whistleblower. A whistleblower needs to make a disclosure directly to one of the below eligible recipients to be able to qualify for protection as a whistleblower under the [Corporations Act 2001 \(Cth\)](#) or, where relevant, the Taxation Administration Act.
- 7.2 If a person wishing to make a disclosure would like to access some advice before lodging a disclosure, they can seek advice from any of the internal or external eligible recipients.

Internal eligible recipients

- 7.3 BCR would like to identify and address wrongdoing as early as possible and encourages whistleblowers to make a report to the Executive Team in the first instance.
- 7.4 Board members and the Executive Team are nominated officers of BCR to receive disclosures.
- 7.5 Additionally, representatives of BCR's Employee Assistance Program (EAP) are nominated by BCR to receive disclosures.

- 7.6 Any eligible recipient who is implicated in a disclosure will not knowingly be involved in any aspect of receiving, handling or investigating the disclosure, ensuring fair treatment of individuals mentioned in a disclosure.
- 7.7 If you wish to seek additional information about the whistleblowing process or protections before formally making a disclosure, you can contact BCR's Disclosure and Protection Officer with any questions you may have.

Disclosure and Protection Officer	
Zanna Elliott, Executive Manager, People & Culture	Phone: 1300 222 748 Email: elliottz@bcrcommunities.com
Heather Marciano, Chief Executive Office	Phone: 1300 222 748 Email: ceo@bcrcommunities.com

External eligible recipients

- 7.8 Whistleblowers can also report a disclosure to:
- 7.8.1 regulatory bodies or law enforcers relevant to the report. For example, breaches of company law can be reported to [Australian Securities and Investment Commission](#) (ASIC), breaches of tax law can be reported to the [Australian Taxation Office](#) (ATO) and breaches of financial requirements can be reported to [Australian Prudential Regulation Authority](#) (APRA).
 - 7.8.2 legal practitioners, and
 - 7.8.3 journalists or members of Commonwealth, State or Territory parliaments (parliamentarians) for public interest or emergency disclosures.
- 7.9 The criteria for making a public interest or emergency disclosure are specified in the [ASIC Regulatory Guide 270: Whistleblower Policies](#). Note that a disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. A discloser should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.
- 7.10 Whistleblowers can also report other misconduct to ASIC and, if not in their remit, ASIC may refer the discloser to another regulator or law enforcer.
- 7.11 In all cases, the whistleblower is still able to access the whistleblower protections available under the whistleblower legislation if the discloser is deemed a whistleblower.

8 HOW TO MAKE A DISCLOSURE

- 8.1 A discloser can report a disclosure to any eligible recipient in person, by telephone, email or letter at any time.
- 8.2 Contact details of eligible recipients in BCR can be obtained from the Customer Service Team on 1300 222 748.
- 8.3 The contact details for the EAP are:

Confidentiality and anonymous disclosures

- 8.4 If a discloser wishes to notify an issue anonymously, they can advise the EAP who will advise a nominated person within BCR agreed to by staff or volunteers without identifying the discloser. Staff and volunteers can refer to BCR's Employee Assistance Program Policy for more information.
- 8.5 Persons making anonymous disclosures are still protected by the whistleblower legislation.
- 8.6 A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity, including during follow-up conversations.
- 8.7 Where a person wishes to remain anonymous, BCR would appreciate it if they maintain ongoing two-way anonymous communication so we can ask follow-up questions or provide feedback.
- 8.8 Communication with disclosers can be through anonymous telephone hotlines and anonymised email addresses; and a discloser may adopt a pseudonym for the purpose of their disclosure if their identity is known to their supervisor, the eligible recipient in BCR or the EAP.

What information should be provided

- 8.9 As much information as possible should be provided about the disclosing matter, including:
 - 8.9.1 that your report is being raised under this policy,
 - 8.9.2 the nature of the actual or suspected disclosable matter,
 - 8.9.3 the names of the people involved, including potential witnesses,
 - 8.9.4 the date, time and location of incident(s),
 - 8.9.5 any material to support your report, such as documents, and
 - 8.9.6 any steps you have taken to report the matter elsewhere.

9 LEGAL PROTECTIONS FOR DISCLOSERS

- 9.1 Legal protections for disclosers are described below. These protections apply to internal disclosures, disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the [Corporations Act 2001 \(Cth\)](#).

Identity protection

- 9.2 BCR cannot disclose the identity of a discloser or information that is likely to lead to the identification of a discloser which we have obtained directly or indirectly because the discloser made a disclosure that qualifies for protection.

- 9.3 The exception is if a person discloses the identity of the discloser:
- 9.3.1 to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the [Australian Federal Police Act 1979 \(Cth\)](#)),
 - 9.3.2 to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the [Corporations Act 2001 \(Cth\)](#)),
 - 9.3.3 to a person or body prescribed by regulations, or
 - 9.3.4 with the consent of the discloser.
- 9.4 BCR can disclose the information contained in a disclosure with or without the discloser's consent if:
- 9.4.1 the information does not include the discloser's identity,
 - 9.4.2 BCR has have taken all reasonable steps to reduce the risk that the discloser will be identified from the information, and
 - 9.4.3 it is reasonably necessary for investigating the issues raised in the disclosure.
- 9.5 It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser, outside the exceptions noted above. If the identity of a discloser is disclosed the discloser can lodge a complaint with BCR about the breach of confidentiality. The discloser can also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

Protection from detrimental acts or omissions

- 9.6 No person may cause detriment to someone else because of (or for reasons including) a belief or suspicion that a person has made, may make, proposes to make or could make, a disclosure in relation to a disclosable matter. Detriment may include:
- 9.6.1 dismissal of an employee,
 - 9.6.2 injury of an employee in his or her employment,
 - 9.6.3 alteration of an employee's position or duties to his or her disadvantage,
 - 9.6.4 discrimination between an employee and other employees of the same employer,
 - 9.6.5 harassment or intimidation of a person,
 - 9.6.6 harm or injury to a person, including psychological harm,
 - 9.6.7 damage to a person's property,
 - 9.6.8 damage to a person's reputation,
 - 9.6.9 damage to a person's business or financial position, or
 - 9.6.10 any other damage to a person.
- 9.7 Actions that are not considered detriment include:

- 9.7.1 moving a person to a different workspace to prevent detriment to them and
- 9.7.2 managing unsatisfactory work performance, if the action is in line with our performance management framework. Staff and volunteers can refer to BCR's Performance Management and Disciplinary Procedure for more information about dealing with underperformance.

Compensation and other remedies

- 9.8 A discloser may be entitled to seek compensation and other remedies through the courts if:
 - 9.8.1 they suffer loss, damage or injury because of a disclosure and
 - 9.8.2 BCR failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Civil, criminal and administrative liability protection

- 9.9 A discloser is protected from any of the following in relation to their disclosure:
 - 9.9.1 civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation),
 - 9.9.2 criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution, other than for making a false disclosure), and
 - 9.9.3 administrative liability (e.g. disciplinary action for making the disclosure). Note that the protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

10 SUPPORT AND PRACTICAL PROTECTION FOR DISCLOSERS

Identity protection (confidentiality)

- 10.1 BCR has implemented a number of measures and/or mechanisms to protect the confidentiality of a discloser's identity (where applicable).
- 10.2 To reduce the risk that the discloser will be identified from the information contained in a disclosure, we:
 - 10.2.1 redact all personal information or reference to the discloser disclosing an event,
 - 10.2.2 refer to the discloser in a gender-neutral context,
 - 10.2.3 will contact the discloser, wherever possible, to help identify certain aspects of their disclosure that could inadvertently identify them, and
 - 10.2.4 have qualified staff or external professionals handle all disclosures, where required.

Securing record-keeping and information-sharing processes

- 10.3 To keep records secure and limit the extent to which the information is shared:
- 10.3.1 all paper and electronic documents and other materials relating to disclosures will be stored securely,
 - 10.3.2 access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure,
 - 10.3.3 only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser, and
 - 10.3.4 each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.
- 10.4 Whilst BCR does endeavour to protect the confidentiality of a discloser's identity, in practice, people may be able to guess the discloser's identity if the discloser:
- 10.4.1 has previously mentioned to other people that they are considering making a disclosure,
 - 10.4.2 is one of a very small number of people with access to the information, or
 - 10.4.3 relates to information that a discloser has previously been told privately and in confidence.

Protection from detrimental acts or omissions

- 10.5 BCR will work closely with a discloser to protect them from detriment. Where applicable, this includes:
- 10.5.1 assessing the risk of detriment through our risk management process. Workers can refer to BCR's Risk Management Policy for more information,
 - 10.5.2 linking the discloser to available support services that they may wish to access including services provide by our EAP. Staff and volunteers can refer to BCR's Employee Assistance Program Policy for more information.
 - 10.5.3 identifying strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation,
 - 10.5.4 taking action to protect a discloser from risk of detriment. For example, allowing the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter, and
 - 10.5.5 ensuring that Board members and the Executive Team are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks associated, manage conflicts, and ensure fairness when managing

the performance of, or taking other management action relating to, a discloser.

- 10.6 A complaint from a discloser that they have suffered detriment will be investigated as a separate matter by a Disclosure and Protection Officer who is not involved in dealing with disclosures and the investigation findings will be provided to the Executive Team. Board members will be informed of any action to be taken.

11 HANDLING AND INVESTIGATING A DISCLOSURE

Handling a disclosure

- 11.1 When BCR receives a disclosure from the discloser, the EAP or a regulatory body, the following key steps apply.
- 11.1.1 When handling a disclosure, the requirements of [Section 9 \(Legal protections for disclosers\)](#) and [Section 10 \(Support and practical protection for disclosers\)](#) are meticulously adhered to.
 - 11.1.2 A sub-committee of the Executive Team (the subcommittee) is formed within one week to receive, review and act on the disclosure. Executive Team members are trained in the process to manage disclosures.
 - 11.1.3 Executive Team members potentially implicated in the perceived unacceptable behaviour/misconduct will be excluded from the management and investigation of the disclosure and, if necessary, an impartial person from outside the organisation will be appointed.
 - 11.1.4 The subcommittee will be convened in a timely manner to review and assess the disclosure to determine whether it qualifies for protection and if a formal, in-depth investigation is required.
 - 11.1.5 If the disclosure qualifies for protection and has not been made anonymously, an invitation is made to the discloser to discuss the disclosure in person with the subcommittee at a time and place that is convenient for/acceptable to them.
 - 11.1.6 The focus of the discussion will be on the substance of a disclosure, rather than what the subcommittee believe to be the discloser's motive for reporting. It is also important for the subcommittee not to presume that disclosures about conduct or behaviour that appear to have had a personal impact on a discloser are somehow less serious. The discloser's experience may indicate a larger or systemic issue.
 - 11.1.7 Where there is uncertainty around the status of the disclosure, specialist advice may be sought.
 - 11.1.8 The discloser is advised within two weeks after the review/meeting whether the disclosure:
 - 11.1.8.1 qualifies for protection and
 - 11.1.8.2 If a formal, in-depth investigation is required.

Investigating a disclosure

- 11.2 When investigating a disclosure, the subcommittee endeavours to complete the investigation as quickly as possible while acknowledging that the process may vary, depending on the nature of the disclosure.
- 11.3 The subcommittee will not disclose information that is likely to lead to the identification of the discloser as part of its investigation process, unless:
 - 11.3.1 the information does not include the discloser's identity,
 - 11.3.2 information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser's name, position title and other identifying details) has been redacted, or
 - 11.3.3 it is reasonably necessary for investigating the issues raised in the disclosure.
- 11.4 The subcommittee may not be able to undertake an investigation if it is not able to contact the discloser (e.g. if a disclosure is made anonymously and the discloser has refused to provide, or has not provided, a means of contacting them). If the disclosure has been made through a third party, we may contact the third party in an attempt to contact the discloser to obtain consent to a limited disclosure to the subcommittee.
- 11.5 The subcommittee may also investigate a disclosure by conducting a broad review on the subject matter or the work area disclosed. In addition, it may investigate an anonymous disclosure, even if it cannot get in contact with the discloser, if the discloser has provided sufficient information to the subcommittee and it redacts information that is likely to lead to the identification of the discloser.
- 11.6 In investigating a disclosure, the subcommittee will determine:
 - 11.6.1 the nature and scope of the investigation,
 - 11.6.2 the person(s) within and/or outside the entity that should lead the investigation,
 - 11.6.3 the nature of any technical, financial or legal advice that may be required to support the investigation, and
 - 11.6.4 the timeframe for the investigation.
- 11.7 The subcommittee will also make sure that investigations are objective, fair and independent, while preserving the confidentiality of the investigation, by:
 - 11.7.1 being independent of the discloser, the individuals who are the subject of the disclosure, and the business unit involved and
 - 11.7.2 undertaking investigations jointly with professional assistance, if required.

Keeping a discloser informed

- 11.8 Provided the disclosure has not been made anonymously and the discloser has supplied their contact details, the subcommittee will provide regular updates to a discloser during the key stages, including:

- 11.8.1 when the investigation process has begun,
- 11.8.2 while the investigation is in progress, and
- 11.8.3 after the investigation has been finalised.

11.9 The subcommittee may also ask that the discloser provide further information if required.

How the investigation findings will be documented, reported internally and communicated to the discloser

- 11.10 The method for documenting and reporting the findings will depend on the nature of the disclosure noting that there may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.
- 11.11 Generally, the findings will be documented by the subcommittee and forwarded to the Chief Executive Officer (CEO) or other Executive Manager who will review them and the processes to ensure BCR's processes and procedures had been adhered to.
- 11.12 Once the findings are confirmed they are forwarded to the Board for review.
- 11.13 The findings are then provided to the discloser and any other people involved in the report.

Review of Findings

- 11.14 The discloser can request a review of the findings and/or the process. If the review proceeds, it will be conducted by an Executive Manager who is not involved in handling and investigating the disclosure. The review findings are provided to the subcommittee, the CEO and the Board.
- 11.15 BCR is not obliged to reopen an investigation and it can conclude a review if it finds that the investigation was conducted properly or new information is either not available or would not change the findings of the investigation.
- 11.16 The discloser is advised that they may lodge a complaint with the CEO, Board members, a regulator, such as ASIC, APRA, ACQSC or the ATO, if they are not satisfied with the outcome of the investigation.

12 ENSURING FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE

- 12.1 BCR ensures the fair treatment of any person mentioned in a disclosure that qualifies for protection, including those who are the subject of a disclosure.
- 12.2 The following measures and/or mechanisms, as far as they are applicable, for ensuring fair treatment of individuals mentioned in a disclosure include:
 - 12.2.1 disclosures will be handled confidentially, when it is practical and appropriate in the circumstances,
 - 12.2.2 each disclosure will be assessed and may be the subject of an investigation,

- 12.2.3 the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported,
- 12.2.4 when an investigation needs to be undertaken, the process will be objective, fair and independent, and
- 12.2.5 an employee who is the subject of a disclosure:
 - 12.2.5.1 is entitled to the presumption of innocence until proven otherwise and is offered support by an EAP representative (the EAP representative cannot be the same person supporting the discloser),
 - 12.2.5.2 will be advised about the subject matter of the disclosure as and when required by the principles of natural justice and procedural fairness and prior to any actions being taken. For example, if the disclosure will be the subject of an investigation and
 - 12.2.5.3 may contact other available support services (e.g. counselling).
- 12.3 The subcommittee will determine the most appropriate time to inform the individual who is the subject of a disclosure about the investigation, provided they inform the individual before making any adverse finding against them. In some circumstances, informing the individual at an early stage of an investigation may compromise the effectiveness of the investigation, such as when there may be concerns that the individual may destroy information or the disclosure needs to be referred to ASIC, APRA, the ATO or the Federal Police.

13 ENSURING THE POLCY IS EASILY ACCESSIBLE TO ALL STAKEHOLDERS

- 13.1 BCR strives to ensure all staff (including new staff) and other stakeholders are aware of and have access to our whistleblower policy. A hard copy of the policy may be obtained by contacting a Disclosure and Protection Officer.
- 13.2 Disclosers outside of BCR can access our whistleblower policy through our website.

14 EDUCATION AND TRAINING

- 14.1 BCR provides education and training to all staff and the Executive Team to ensure they are aware of our whistleblower policy and that all levels of management, particularly line managers, receive appropriate training in how to effectively deal with disclosures.
- 14.2 The management team from which our whistleblower subcommittee is selected, receive training in the processes and procedures for receiving and handling disclosures, including training relating to confidentiality and the prohibitions against detrimental conduct.

- 14.3 Directors also receive training in BCR commitment and obligations to confidentiality, protecting disclosers of wrongdoing and their role in supporting and protecting whistleblowers and the processes to be followed.

15 DEFINITIONS AND TERMS

- 15.1 **Board of Directors:** group of elected individuals representing the members and who are responsible for governing, overseeing the affairs of, and making strategic decisions for an organisation on behalf of its members, noting that the Board is appointed by the members of the organisation.
- 15.2 **Director:** an individual appointed to the Board of Directors responsible for contributing to the collective decision making of the Board.
- 15.3 **Eligible whistleblower:** a person with a connection to BCR who may be in a position to observe or be affected by misconduct and may face reprisals for reporting it. It includes individuals who are or have been any of the following in BCR:
- 15.3.1 employees and/or volunteers of BCR,
 - 15.3.2 directors of BCR,
 - 15.3.3 individuals who supply services or goods to BCR (paid or unpaid),
 - 15.3.4 associates (contractors) of BCR, and
 - 15.3.5 a relative, dependent or spouse of an individual (e.g. relatives, dependents or spouse of current and former employees, contractors, associates).
- 15.4 **Executive Manager:** a member of the Management Team.
- 15.5 **Management Team:** the Chief Executive Officer and their direct reports excluding the Marketing and Communications Manager.
- 15.6 **Unauthorised disclosures:** the disclosure of information to BCR which it is not authorised to access.
- 15.7 **Whistleblowing:** the disclosure of information, either internally within BCR or externally to BCR's auditor, actuary, or authorised whistleblower complaints service or hotline, or to ASIC or APRA as regulators, where there are reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances.
- 15.8 **Workers:** BCR's staff, volunteers and contractors.

16 COMPLIANCE WITH THIS POLICY

- 16.1 If there is reason to believe that a director, committee member or worker has failed to comply with this Policy, it will be investigated in accordance with relevant Policies and Procedures.

- 16.2 Failure of a director, committee member or worker to comply with this Policy may result in:
- 16.2.1 the director or committee member being asked to resign their position or
 - 16.2.2 the worker facing disciplinary action and/or reasonable management instruction in accordance with the Performance Development, Performance Management and Disciplinary Policy and Performance Management and Disciplinary Procedure.

17 RELATED LEGISLATION AND DOCUMENTS

[Australian Federal Police Act 1979 \(Cth\)](#)

Consumer Complaints Policy

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

Employee Assistance Program Policy

Performance Development, Performance Management and Disciplinary Policy

Performance Management and Disciplinary Procedure

Risk Management Policy

Staff Grievance Policy

18 FEEDBACK

- 18.1 Workers and clients can provide feedback about this document by emailing info@BCRCommunities.com.

19 DOCUMENT VERSION CONTROL

- 19.1 BCR will maintain a high standard of quality and control of all documented information and records. All documents (either retained or referred to) will be current, suitable for use, accessible, quality controlled, and stored in a safe and secure location.
- 19.2 BCR policies and procedures will be reviewed by the relevant responsible officer either:
- 19.2.1 prior to the mandatory three year review period or
 - 19.2.2 when an incident or a known change (legislative or internal) has occurred or a complaint or feedback has been received that relate to specific BCR policies and/or procedures,
- whichever occurs first.

Section 1	Title	Whistleblower Policy		
	Policy Location	Intranet		
	Responsible Officer	Chief Executive Officer		
	Created By		Date Created	
	Date Approved		Board to Approve all Modifications	Yes
	Reviewer	Executive team		

Section 2	Version No	Modified/Reviewed By	Modifications Made	Date	Status
	001		Policy approved and implemented		Approved
	002	KMT	Reformatted original document	21/11/2023	Draft
	003	Executive Team	Grammatical and minor procedural changes	30/04/2024	Approved
	004	Executive Team	Replaced cover sheet	22/07/2024	Approved
	005	KMT	Added new clauses 5.1 (Disclosable conduct) and 6.3 (Unauthorised disclosures), definitions of unauthorised disclosures and whistleblowing	11/11/2024	Draft
	004	Executive Team		25/11/2024	Approved
	005	Board		28/08/2025	Approved