

## Table of Contents

People & Culture Strategic Policy Details .....	2
1. Process Summary .....	2
a. Employees, Volunteers, Contractors, Consultants .....	2
b. CEO .....	2
c. Board of Directors .....	2
d. Whistleblowing Services Pty Ltd.....	2
2. Policy Statement.....	2
3. Scope .....	3
4. Our Systems of Oversight .....	3
a. Organisation Expectations.....	3
b. Service Expectations.....	3
c. Employment Expectations.....	4
d. External Standards.....	4
e. Raising an Issue.....	4
5. Purpose.....	5
6. Application of Policy .....	6
a. Making A Report.....	6
b. What Do I Report? .....	6
c. Action McCallum Might Take After A Disclosure .....	7
7. What Protections Are Available To Me If I Make A Disclosure?.....	7
a. What Support Is Available To Me? .....	8
8. Definitions .....	9
9. References .....	9
External References.....	9
Relevant Policies.....	9
Contact Person .....	9

People & Culture Strategic Policy Details	
<b>Strategic Policy Coverage:</b>	All current and former employees including apprentices, trainees or students gaining work experience; volunteers, board members, contractors, consultants, customers, families and carers, service providers, suppliers and business partners of McCallum.
<b>Date Approved:</b>	November 2023
<b>Approved By:</b>	Board of Directors
<b>Revision Date(s):</b>	November 2024

## 1. Process Summary

### a. Employees, Volunteers, Contractors, Consultants

- Follow the principles and procedural details within this policy.
- Encourage individuals to disclose concerns relating to improper activity, conduct or wrongdoing.
- Provide an environment where individuals who disclose improper activity, conduct or wrongdoing feel they can do so within a safe and secure environment where their interests are protected.
- Ensure individuals are aware of the various confidential reporting methods available to anyone wanting to report improper activity, conduct or wrongdoing.

### b. CEO

- Sets over-arching policy to ensure legal compliance, commensurate with industry practice and probity and delegates appropriate ancillary policy areas to responsible managers.

### c. Board of Directors

- Responsible for adopting the Protected Disclosure Policy.
- Responsible for oversight of this Policy and disclosures under this Policy.
- Sets framework to ensure legal compliance, commensurate with industry practice and probity and for nominating the McCallum Protected Disclosure Investigation Officer (WIO).

### d. Whistleblowing Services Pty Ltd

- Receives disclosures made via online or phone service.
- Assesses information provided in disclosure and relays to the appropriate nominated person within McCallum.
- Provides channel of communication between McCallum and the person who has made the disclosure.

## 2. Policy Statement

McCallum Disability Services is an organisation that is committed to upholding the highest levels of integrity and ethical behaviour by fostering an open and supportive culture in which people are able to raise concerns regarding actual or suspected unlawful, unethical or undesirable conduct without fear or detriment.

McCallum is committed to protecting and supporting the dignity, wellbeing, career, and professional reputation of anyone reporting misconduct.

McCallum operates in a highly complex environment providing services and supports to a wide range of people. In doing this McCallum draws upon a diverse group of people and has its performance assessed by a range of people, including the people we work with, staff, parents and guardians, our Board and external agencies.

To operate in this environment McCallum has developed a range of ways to identify issues and inform people in the business as part of our policies and procedures within our Quality System. It should also be noted that some of those ways also include pre-set responses required by the Board and external agencies (such as mandatory reporting).

It is the Boards' expectations that people will use the existing channels of communication provided for in these established policies and procedures. The Board also understands that in some circumstances this is not possible or appropriate.

Accordingly, the Board has developed an additional process for a disclosure and to ensure people are protected from any form of retribution as a result of speaking up. This is set out in this document known as the Protected Disclosure Policy.

### 3. Scope

This policy is applicable to all current and former employees, volunteers, Board members, contractors, consultants, customers, families and carers, service providers, suppliers and business partners of McCallum.

### 4. Our Systems of Oversight

#### a. Organisation Expectations

These policies and procedures set out our general approach to the oversight of services consistent with good governance with a focus on improvement.

- 2.3 Risk Management Policy:
  - Provides McCallum's Risk Management Framework.
- 1.1 Quality Policy:
  - Provides organisational governance and instruction, sets the Quality Management Framework, and aligns with NDIS certification and other accreditation as required.
- 4.1 Practice Standards Policy:
  - Sets the Quality Standards that McCallum must meet as a registered NDIS Provider.
- 4.8 Positive Behaviour Support & Restrictive Interventions Procedure:
  - Sets out the way McCallum will follow the least restrictive approach in all service delivery and adhere to the regulatory guidelines relating to restrictive practices.

#### b. Service Expectations

These policies and procedures guide our practices for dealing with services not meeting expectations. They provide an opportunity for everyone to let us know where we or our people are not meeting expectations or are placing people at risk.

- 3.6 Workplace Event Reporting Procedure:
  - Mandates requirements for reporting workplace events and maintaining an effective reporting system.

- 4.9 Customer Event Reporting Procedure:
  - Directs McCallum’s Incident Management System, which is designed to meet legislative requirements, identify issues and drive continuous improvement.
- 4.5 Compliments & Complaints Procedure:
  - Sets out McCallum’s Compliments and Complaints Management System for both internal and external complaints.
- 3.3 Issue Resolution Procedure:
  - Sets out the Issue Resolution Process for OHS issues not resolved at the immediate workplace time and level.

### c. Employment Expectations

These policies and procedures set out our expectations for our people and providers and provide pathways for addressing where those expectations are not being met.

- McCallum’s Code of Conduct:
  - Sets out the overarching framework for how McCallum’s employees conduct themselves at work.
- 6.6 Grievance Policy:
  - Provides guidance and support for internal (staff) and external (contractors, volunteers) work related grievances or complaints.
- 6.1 Respect at Work Policy:
  - Sets out the process for handling complaints of bullying, harassment, victimisation, discrimination, vilification and violence.
- 6.23 Sexual Harassment Policy:
  - Sets out the process for handling complaints of sexual harassment in the workplace.

### d. External Standards

There are also several organisations that have oversight of McCallum and people working for or providing services to McCallum. This includes:

- Clinical / Behavioural Psychology
- Physiotherapy.
- Nursing.
- Medical.
- Pharmacy.
- Relevant Food and manufacturing regulators.

### e. Raising an Issue

Each of the Expectations (Organisation, Service, Employment) above have prescribed standards and ways that issues are raised and addressed. The above policies and procedures should be referred to when seeking to understand our standards.

Where the policy or procedure applies, we ask that you use those processes, unless there are reasons why the procedure may not suit or does not apply.

Examples of when it may not be appropriate to follow a McCallum policy or procedure may include:

- You have already reported the issue under the policy and:

- This was not recorded;
- This was not actioned;
- There does not appear to be any response, or any change communicated to you.
- Having read the policies and procedures you are unable to find a reporting pathway.

### **Type of Issues to be Disclosed**

We do not intend to be prescriptive of what can be reported, although we ask that you use the existing issues pathways where possible. Some examples of behaviour that could be reported include concerns about:

- Inappropriate use of our assets.
- Inappropriate conduct with our customers or our people.
- Unsafe activities involving our customers or our people.
- Taking of money or property without authority.
- Action not consistent with NDIS requirements.

## **5. Purpose**

The objectives of this policy are to:

- Encourage and empower individuals to report improper activity, conduct or wrongdoing that they know about or have witnessed.
- Provide a safe and secure environment for any person internal or external to the organisation to report improper activity, conduct or wrongdoing while protecting them from victimisation or retaliation, and protecting their interests.
- Provide a process for individuals who do not feel that:
  - action is being taken in accordance with McCallum standards and expectations; or
  - they can make a disclosure about a workplace issue through the nominated policy and procedure.
- Ensure all disclosures are dealt with appropriately and lawfully.
- Ensure the identity of the discloser, the content of the disclosure and information related to the disclosure is kept confidential.
- Ensure that any disclosures are used as an opportunity to improve our culture, systems and behaviours.

Improper activity, conduct or wrongdoing includes but is not limited to:

- Inappropriate conduct – namely violent; abusive; neglectful; exploitative.
- Actions that might be considered contrary to law – namely fraudulent; illegal; corrupt; misappropriation; not declaring a real or perceived conflict of interest; serious misuse of information; mismanagement.
- Inappropriate behaviour – namely dishonest; unethical; violates the law or any legal code; is creating an unsafe environment; breaches any of our policies; discrimination; harassment and/or bullying of any kind; victimisation; any conduct which is detrimental to McCallum and could cause financial or non-financial loss or damage to its reputation.
- Endangerment to public health, safety and the environment.
- Not meeting clinical standards, professional standards, customer standards for protection, rules to prevent taking advantage of customers.

## 6. Application of Policy

### a. Making A Report

McCallum policy and procedures expect people to raise concerns with their managers or People & Culture, or if external, to the relevant Operational Manager or our Quality Manager. Where this is not possible or practical, or the concerns addressed, McCallum has nominated an alternative pathway to rise the concerns as a protected disclosure.

To ensure that the Board has a clear view of issues, we have engaged an external independent party to receive a disclosure. Our current supplier is called Whistleblowing Services Pty Ltd. There are two available avenues for a person to make a protected disclosure. These are:

#### 1. Online via: McCallum | [whistleblowingservice.com.au](https://whistleblowingservice.com.au)

Please click on the 'Make a Report' button. You will be redirected to the new page where you need to:

- enter '**MCC2020**' in the 'Unique Key' field;
- enter '**bm4b42020**' in the 'Client Reference Number'.
- Click on 'next'.

You can choose to remain anonymous or reveal your identity when making a protected disclosure. If you wish to remain anonymous, we encourage you to submit your report via this secure online reporting platform.

This service from [whistleblowingservice.com.au](https://whistleblowingservice.com.au) is an independent external service to enable McCallum to provide the best possible reporting experience to our people and importantly, to ensure that we can protect you as promised.

#### 2. Make a report disclosure via phone: 1300 687 927

Available Monday to Friday 8:00am to 5:00pm (excluding public holidays). You will be asked to provide the Unique Key and the Client Reference Number (see below).

- Unique Key: **MCC2020**
- Client Reference Number: **bm4b42020**

When you make a report, you will be provided with a reference key. You will need this key to login to provide any additional information or to review updates provided by McCallum.

### b. What Do I Report?

If you are concerned that our standards are not being met, and that there are issues/wrongdoing that may include suspected or actual misconduct that is in breach of general law or McCallum policies, procedures and code of ethics that you believe McCallum should be aware of, that is when you should consider making a report.

Examples could include:

- Practices endangering the health or safety of people.
- Conduct in breach of state or federal legislation.
- Issues with the oversight of organisation or waste of resources.

- Conduct contrary to McCallum Code of Conduct.
- Illegal, immoral, or illegitimate practices.
- Practices endangering the environment.

Wrongdoing, for the purpose of this Policy, does not generally include personal work-related grievances except in limited circumstances, including if the disclosure has significant implications for McCallum that do not relate to the discloser.

However, disclosers are encouraged in all cases to report even if there is any uncertainty as to whether particular conduct is a wrongdoing under the policy. The independent service provider will request you to provide information. When providing information, we ask that you provide as much information and detail as possible to assist us to understand the issue.

Examples of details you may be asked for might include:

- The nature of the wrongdoing.
- People that might be involved.
- Information you have about the wrongdoing.
- Whether other information might be available to assist.
- Evidence you have to support the disclosure.

Please note, if a disclosure is made with limited or a lack of detail, this may limit McCallum's ability to assess a disclosure and act on the disclosure.

Where a disclosure is found to be false or not supported, McCallum will not progress the matter.

McCallum may also review the disclosure to determine if there has been a breach of the McCallum's *Code of Conduct* or *6.1 Respect At Work Policy* by the discloser.

### **c. Action McCallum Might Take After A Disclosure**

McCallum will make an assessment of the issues raised to determine the appropriate approach to review the disclosure.

When we establish there is an existing system of handling issues, we may choose to use that pathway. Specifically for example, any disclosure deemed to be a grievance will be dealt with under *6.6 Grievance Policy*.

Any complaint of abuse of a customer will be dealt with under *4.9 Customer Event Reporting Procedure* and the *4.5 Compliments & Complaints Procedure*.

## **7. What Protections Are Available To Me If I Make A Disclosure?**

People making a disclosure will be treated fairly and will not suffer any detriment as a result of making a disclosure. A discloser will not be subject to any civil, criminal or disciplinary action for making a report that is covered by this procedure.

Please note that in some situations an individual may be requested to participate in an investigation. This will occur not because they made the disclosure, but because when an investigation is required, their role was identified as a role that should be consulted. Participation in an investigation is per the applicable McCallum procedure.

- **Confidentiality**
  - Generally, disclosures will be treated confidentially where an investigation can only proceed based on the information provided in the disclosure and/or may identify the discloser, then McCallum will seek your express informed approval to proceed.
- **Anonymous Reporting**
  - If a person wishes to make their disclosure anonymously, their wish will be honoured unless overridden by law.
  - Where anonymity has been requested, the discloser is required to maintain confidentiality on their own account and is expected to refrain from discussing the matter with any unauthorised persons.
- **Protection From Detriment**
  - McCallum is committed to protecting the rights of a discloser and will not tolerate any retaliatory action or threats of retaliatory action against any person who has made or who is believed to have made a report of wrongdoing. Please see *6.1 Respect At Work Policy*.
- **Information Security**
  - McCallum will take all reasonable precautions to store any records relating to a report of wrongdoing securely and to permit access by authorised persons only. Please see *6.2 Counselling & Disciplinary Procedure*.
- **Disclosers Implicated In Wrongdoing**
  - Sometimes a discloser may be implicated in the wrongdoing, however that person must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a disclosure in accordance with this procedure.
  - However, these protections do not necessarily absolve the discloser from the consequences of any involvement on their own part in the wrongdoing.
  - A person's liability for their own conduct is not affected by their reporting of that conduct in accordance with this procedure. In some circumstances, an admission may be a mitigating factor when considering disciplinary action.

**a. What Support Is Available To Me?**

The following services are always available to you:

- (McCallum Employees Only) - McCallum Employee Assistance Program – Ballarat Community Health (1800 054 172)
- Lifeline (13 11 14)
- Beyond Blue (1300 224 636)



In addition, where a decision has been made to undertake a detailed assessment of the issues raised, a Discloser Protection Officer will be appointed to provide support.

## 8. Definitions

### Individuals or Disclosers

Includes current and former employees including apprentices, trainees or students gaining work experience, volunteers, board members, contractors, consultants, customers, families and carers, service providers, suppliers and business partners of McCallum.

### Eligible Protected Discloser

Any representative who makes a disclosure under this policy or otherwise under any other applicable Protected Disclosure Legislation.

## 9. References

### External References

Public Interest Disclosures Act 2012 (Vic)  
Privacy and Data Protection Act 2014 (Vic)  
Crimes Act 1958 (Vic)

### Relevant Policies

McCallum Code of Conduct  
1.1 Quality Policy  
2.3 Risk Management Policy  
3.3 Issue Resolution SOP  
3.6 Workplace Event Reporting SOP  
4.1 Practice Standards Policy  
4.5 Compliments & Complaints COP  
4.8 Positive Behaviour Support & Restrictive Interventions COP  
4.9 Customer Event Reporting COP  
6.1 Respect at Work Policy  
6.2 Counselling & Disciplinary Procedure  
6.6 Grievance Policy  
6.23 Sexual Harassment Policy

### Contact Person

Chief Executive Officer (03) 5334 1921