

Whistleblower Policy

Purpose

ORS Group (ORS) is committed to a culture of integrity and accountability and systems that support transparency in decision-making, good governance and ethical behaviour. This Policy supports any individual, whether internal or external to ORS, to raise concerns of wrongdoing regarding actual or suspected unethical, unlawful or undesirable conduct so that appropriate action can be undertaken. An individual raising a concern of wrongdoing is defined as a 'Whistleblower' under this policy. ORS Group will treat all information disclosed in a confidential manner (so far as the circumstances permit), conduct a fair and objective investigation and take appropriate remedial steps or notify relevant authorities.

The purpose of this policy is to:

- Promote an open and transparent culture within ORS
- Encourage and facilitate the disclosure by individuals of Reportable Conduct without fear of reprisal
- Provide appropriate protection for those who make disclosures under this Policy
- Demonstrate ORS' commitment to a fair workplace and outline the process for managing matters of wrongdoing/Reportable Conduct.

What is Reportable Conduct?

You may make a report under this policy if you believe that a director, employee, contractor or other person who has business dealings with ORS has engaged in conduct (Reportable Conduct) which:

- is dishonest, fraudulent or corrupt activity, including bribery or other activity in breach of ORS Group's [Fraud Control Policy and Plan](#)
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in breach of ORS' policies (such as dishonestly altering documents or data, adopting questionable accounting practices or wilfully breaching ORS' Code of Conduct or other policies or procedures);
- amounts to an abuse of authority;
- may cause financial loss to ORS or damage its reputation or be otherwise detrimental to ORS' interests;
- involves harassment, discrimination, or bullying; or
- involves any other kind of serious impropriety.

Duties of Employees in relation to Reportable Conduct

It is expected that ORS employees who become aware of known, suspected, or potential cases of Reportable Conduct will make a report under this policy or under other applicable policies

How to make a report

ORS has several channels for making a report if a person becomes aware of any issue or behaviour which he or she considers to be Reportable Conduct:

Internal Reporting

Whistleblowers are able to:

- Raise the matter with their immediate manager or another senior manager within the business including the CEO and COO
- Report the matter anonymously through the Anonymous Feedback form on the intranet
- Lodge a grievance via the Safety First button on the intranet as per ORS' [Grievance Handling Procedure](#)
- Report actual or potential fraud through the Fraud form on the intranet as per ORS' [Fraud Control Policy and Plan](#)

The above methods of reporting are also covered in detail in the [Suggestions and Feedback Policy](#).

External Reporting

Whistleblowers are able to:

- Report the matter anonymously through the enquiry form on ORS Group's website
- Email feedback@orsgroup.com.au
- Call 1800 000 677

If you wish to speak to someone outside ORS, other options include:

- National Disability Insurance Scheme (NDIS) participants can contact the National Disability Insurance Agency (NDIA) on 1800 800 110
- Registered Training Organisation (RTO) students can contact the ASQA complaints team on 1300 701 801, or email complaintsteam@asqa.gov.au
- Workplace rehabilitation clients can contact their insurer or relevant state based Work Cover body:
 - WA: Workcover Advice & Assistance hotline 1300 794 744
 - NSW: icare 13 44 22
 - VIC: 1800 136 089
 - QLD: 1300 362 128
 - ACT: 02 6207 3000
 - TAS: 1300 366 322
 - National: Comcare 1300 366 979

The above methods of reporting are also covered in detail in ORS' [Complaints and Feedback Policy](#)

Confidentiality

As far as possible, and subject to the need to conduct proper investigations and take any consequential disciplinary steps, ORS is committed to preserving the confidentiality of:

- the identity of the Whistleblower;
- the identity of the person who is the subject of the Reportable Conduct

Although Whistleblowers have the right to make a report anonymously, ORS strongly recommends that Whistleblowers identify themselves so that ORS can ensure the necessary support is provided.

If an anonymous disclosure is made, the Whistleblower must ensure that the report is supported by the provision of all relevant details and evidence to substantiate the report.

Investigation

- All reports will be treated seriously and will be subject to a thorough investigation with the objective of locating evidence that either substantiates or refutes the claims/allegations made
- Depending on the nature of the Reportable Conduct, the investigation will be conducted by the relevant manager. In the event that the manager is the subject of an investigation or allegation, the investigation will be conducted by the COO or CEO

- Principles of natural justice will apply to the investigation so that the investigation is conducted without bias and the matters which are the subject of the investigation are made known to the person who is the subject of the report and that person is given an adequate opportunity to respond to those matters.
- The Whistleblower, assuming they are known, will be informed of the progress and outcome of the investigation.
- A record of steps taken in the conduct of an investigation will be maintained to allow the review of the effectiveness of the procedures employed in investigations.

Investigation Findings

- At the end of the investigation, the CEO will determine the appropriate response. This response will include addressing any unacceptable conduct and taking remedial action required to prevent any future occurrences of the same behaviour.
- In the event of the CEO being the subject of an investigation or allegation, the board will determine the report and corrective measures.
- Where issues of discipline arise the response will be in line with ORS' [Performance Counselling and Disciplinary Procedure](#). Where allegations of Reportable Conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

Review

This policy will be reviewed on an annual basis