

### POLICY AND PROCEDURE STATEMENT

Melba Support Services Ltd and Melba Support Services Australia Ltd (together referred to as ‘Melba’) is committed to safeguarding the health and wellbeing of all people supported and to operating legally, ethically and properly in accordance with relevant legislation and regulation, recognised ethical principles, and our organisational policies and procedures. Employees, volunteers and contractors are expected to support this objective, if necessary, by reporting non-compliant actions by other people. Those who make such reports, as set out in this policy, will not be penalised in any way.

This Policy and Procedure is intended to build confidence and trust in Melba’s whistleblower processes and procedures. It has been put in place to encourage and support members of Melba’s community to raise concerns about any suspected wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without fear of detriment, or being subject to detriment. This Policy is an important part of a speak up culture and Melba takes all concerns raised seriously. Melba relies upon those in the Melba community to report concerns so that it can address any substantiated wrongdoing when it occurs.

### SCOPE

This policy and procedure applies to all Eligible Whistleblowers, being current and former Melba Support Services officers, employees, volunteers (including interns, secondees, and directors) and suppliers of goods and services to Melba (including contractors, consultants, and business partners) and their relatives, dependents, and spouses. Each of the above is an Eligible Whistleblower and qualifies for protection as a whistleblower if they have made a disclosure of information relating to a disclosable matter to a relevant person or body.

An Eligible Whistleblower who has reasonable grounds to suspect that an employee, volunteer or contractor has breached the law, Melba’s Code of Conduct, Melba’s Constitutions, or generally recognised principles of ethics, must report their concern.

If an Eligible Whistleblower wishes to make a disclosure, they may do so using one of the options set out in this policy and procedure. Disclosures may be made anonymously, and this anonymity shall, as far as possible, be preserved.

This policy does not authorise any employee to inform commercial media or social media of their concern (except in the very limited circumstances of a ‘public interest disclosure’ – see below under ‘Who Can Receive a Disclosure’).

### PURPOSE

This policy establishes the intent of Melba’s whistleblower process to:

- Encourage and enable the reporting of wrongdoing, including matters that may cause harm to people supported.
- Encourage and enable the identification of wrongdoing which might not otherwise be uncovered.
- Enable Melba to deal with reports from whistleblowers in a way that protects the identity of the whistleblower and supports them in their actions.
- Ensure disclosures are dealt with appropriately and in a timely manner.
- Provide for the secure storage of information collected through the whistleblower process.
- Protect whistleblowers against reprisal.

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

- Help ensure Melba maintains the highest standards of ethical behavior and integrity within its service delivery and direct supports.

### DEFINITIONS

The below definitions apply to this policy and procedure.

| Term                          | Definition  |
|-------------------------------|---|
| <b>Disclosable matter</b>     | is defined in the next section.   |
| <b>Eligible Whistleblower</b> | means a person who may make or does make a disclosure and includes all current and former officers, employees, volunteers (including interns, secondees, and directors) and suppliers of goods and services to Melba (including contractors, consultants, and business partners) and their relatives, dependents, and spouses.  |
| <b>Eligible Recipient</b>     | means a person who can receive a disclosure under this policy, including but not limited to: <ul style="list-style-type: none"> <li>• Melba’s nominated Whistleblower Protection Officer: the Board has nominated the organisation ‘STOPline’ to act as Melba’s whistleblower protection officer.</li> <li>• An officer (e.g. a Board member) or senior manager of Melba;</li> <li>• A legal practitioner for the purposes of obtaining legal advice or legal representation in relation to whistleblowing;</li> <li>• ASIC, APRA or other prescribed Commonwealth authorities or, for tax related matters, the Commissioner of Taxation;</li> <li>• Melba’s internal or external auditors or actuaries; or</li> <li>• Under certain circumstances, a journalist or parliamentarian as a ‘public interest disclosure’ or ‘emergency disclosure’.</li> </ul> |
| <b>Protected Disclosure</b>   | A report about a ‘disclosable matter/s’ which is made to an Eligible Recipient by an Eligible Whistleblower.  |

### MATTERS THE POLICY APPLIES TO

This policy applies to disclosures about ‘disclosable matters’ raised by Eligible Whistleblowers to Eligible Recipients. Disclosures that are not made in accordance with this policy and procedure do not qualify for whistleblower protections.

Disclosable matters are those where a person has reasonable grounds to suspect:

- misconduct or an improper state of affairs in relation to Melba (which may not involve the contravention of a particular law); or
- that Melba (including its employee or officers) has engaged in conduct that constitutes an offence against a provision of certain Acts, e.g., including the *Corporations Act 2001*, the *Australian Securities and Investments Commission Act 2001*, the *Banking Act 1959*, the *Financial Sector (Collection of Data) Act 2001*, the *Insurance Act 1973*, the *Life Insurance Act 1995*, the *National Consumer Credit Protection Act 2009*, and the *Superannuation Industry Supervision Act 1993*; or
- that Melba (including its employees and officers) has engaged in conduct which constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- that Melba had engaged in conduct which represents a significant risk to public safety or the stability of or confidence in the financial system.

|   |                                      |
|---|--------------------------------------|
| Title: Protected Disclosure (Whistleblowing) Policy and Procedure | Date Last Reviewed: 18 February 2025 |
| Position Responsible: Chief Employee Experience Officer           | Next Review Date: 18 February 2027   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

Examples of disclosable matters include but are not limited to the following:

- Illegal conduct, such as theft, violence or threatened violence, and criminal damage against property;
- Fraud, money laundering or misappropriation of funds;
- Offering or accepting a bribe;
- Financial irregularities;
- Failure to comply with, or breach of, legal or regulatory requirements;
- 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.

Eligible Whistleblowers who have reasonable grounds to suspect that there is a disclosable matter and who make a Protected Disclosure to an Eligible Recipient are protected under this policy and procedure even if their disclosure is not proven.

### MATTERS NOT COVERED BY THE POLICY

The policy is not designed to question financial or business decisions taken by Melba or to seek reconsideration of any matter that has already been addressed under Melba's other policies or procedures.

Concerns regarding occupational health and safety should, where possible, be made through Melba's occupational health and safety procedures.

Disclosures that relate to personal work-related grievances are not covered by this policy, unless those grievances also relate to a disclosable matter. Personal work-related grievances include things such as:

- An interpersonal conflict between the person disclosing and another employee;
- A decision that does not involve a breach of workplace laws;
- A decision about the engagement, transfer or promotion of the person disclosing;
- A decision about the terms and conditions of engagement of the person disclosing; or
- A decision to suspend or terminate the engagement of the person disclosing or to otherwise discipline the person disclosing.

Employees with personal work-related grievances should refer to Melba's internal grievance and issue resolution policy.

A personal work-related grievance may still qualify for whistleblower protection if it includes information about misconduct, or if Melba or any person covered by this policy and procedure has breached employment or other laws punishable by imprisonment for a period of 12 months or more or engaged in conduct that represents a danger to the public, or the person disclosing (the discloser) suffers from or is threatened with detriment for making a disclosure.

Concerns or complaints from clients and/or their families are not covered by this Policy and should be made in accordance with the Complaints, Compliments and Feedback Policy and Procedure.

Concerns or incidents relating to children, including child abuse, child protection or child safety should be raised in accordance with Melba's child safety policy framework, and the Children and Young Persons Safety and Wellbeing Policy.

Concerns or complaints relating to employment or the engagement of a volunteer or independent contractor should be raised in accordance with the Internal Grievance and Issue Resolution Policy.

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

### WHO CAN RECEIVE A DISCLOSURE?

The following Eligible Recipients can receive disclosures under this policy and procedure:

- Whistleblower protection officer: the Board has nominated the organisation 'STOPline' to act as Melba's whistleblower protection officer. Accordingly, disclosures may be made under this procedure to 'STOPline'. 'STOPline' can also be contacted if the discloser wants to obtain additional information before making a disclosure;
- An officer (e.g. a Board member) or senior manager of Melba;
- A legal practitioner for the purposes of obtaining legal advice or legal representation in relation to whistleblowing;
- ASIC, APRA or other prescribed Commonwealth authorities or, for tax related matters, the Commissioner of Taxation;
- Melba's internal or external auditors or actuaries; or
- Under certain circumstances, a journalist or parliamentarian as a 'public interest disclosure' or an 'emergency disclosure'.

For a 'public interest disclosure' to be a Protected Disclosure, the following must apply:

- At least 90 days must have passed since the Eligible Whistleblower made the disclosure to ASIC or another Commonwealth body prescribed by regulation;
- The Eligible Whistleblower does not have reasonable grounds to believe that action is being, or has been taken, in relation to the disclosure;
- The Eligible Whistleblower has reasonable grounds to believe that making a further disclosure of information is in the public interest; and
- Before making the public interest disclosure, the Eligible Whistleblower has given written notice to the body to which the previous disclosure was made (e.g., ASIC) that:
  - sufficient information to identify the previous disclosure; and
  - states that the Eligible Whistleblower intends to make a public interest disclosure.

For an 'emergency disclosure' to be a Protected Disclosure, the following must apply:

- the Eligible Whistleblower has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- the Eligible Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- before making the emergency disclosure, the Eligible Whistleblower has given written notice the body to which the previous disclosure was made that:
  - includes sufficient information to identify the previous disclosure; and
  - states that the Eligible Whistleblower intends to make an emergency disclosure; and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

It is important that an Eligible Whistleblower understands the criteria for making a public interest or emergency disclosure, and a person who intends to disclose should contact an independent legal advisor before doing so.

### HOW TO MAKE A DISCLOSURE

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

Melba strongly encourages Eligible Whistleblowers to raise disclosures with STOPline. However, disclosures may be made to any Eligible Recipient.

Disclosures to STOPline can be made 24 hours a day, 365 days a year. STOPline provides multiple methods for making a report and has implemented a number of safeguards to assist confidential and anonymous reporting.

Disclosures can be made anonymously. An Eligible Whistleblower can maintain their anonymity while making a disclosure, over the course of any investigation, and after the investigation is finalised. An Eligible Whistleblower can refuse to answer questions that they feel could reveal their identity at any time. Anonymous disclosures qualify for protections under this policy and procedure.

### Externally

STOPline has several methods of receiving a disclosure, which are set out below. A telephone call is preferred so that sufficient information can be obtained to assess whether the disclosure is a Protected Disclosure and, where appropriate, enable the conduct of an appropriate investigation.

|  |  |
|--|--|
| <b>Telephone:</b><br>Toll Free – 1300 304 550  | <b>Locked Bag Mail:</b><br>Melba Support Services<br>C/- The STOPline<br>Locked Bag 8<br>Hawthorn VIC 3122                 |
| <b>Facsimile:</b><br>Melba Support Services<br>C/- The STOPline<br>(03) 9882 4480  | <b>Email:</b><br>melba@stoline.com.au  |
| <b>Website:</b><br>Go to STOPline’s website<br><a href="http://www.demo2016.stoplinereport.com">http://www.demo2016.stoplinereport.com</a> | <b>App:</b><br>Search for STOPline in the iTunes App Store or Google Play to download the free app and submit a disclosure |
| <b>Melba Website</b><br>Link to make a disclosure via the Melba website  |  |

### Internally

While Melba strongly encourages reports to STOPline, Eligible Whistleblowers can also make disclosures to:

- the Chief Executive Officer: Hayley.Dean@melbasupport.com.au
- the Chief Employee Experience Officer: Bridget.Thakrar@melbasupport.com.au

If the disclosure relates to either of those individuals, or an Eligible Whistleblower would prefer to make a disclosure to another Eligible Recipient within Melba, a disclosure can be made to:

- the President of the Melba Board;
- the Company Secretary/General Counsel; or
- the Chief Human Rights and Practice Innovation Officer.

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

If a disclosure involves the CEO and the Eligible Whistleblower does not feel comfortable reporting to STOPline, the matter should be reported to President of the Board. If a disclosure involves the President of the Board, the matter should be reported to the Vice President of the Board.

### LEGAL PROTECTIONS FOR DISCLOSERS

An Eligible Whistleblower who makes a Protected Disclosure qualifies for the protections set out in this policy and procedure. These protections apply to all Protected Disclosures under this policy and procedure, including those to STOPline, to legal practitioners, to regulatory and other external bodies and to public interest and emergency disclosures.

The following protections are provided to Eligible Whistleblowers:

#### Identity protection/confidentiality

If an Eligible Whistleblower makes a report of alleged or suspected improper conduct under this procedure and that report is a Protected Disclosure, STOPline the Eligible Recipient (depending on who the disclosure is made to) will protect the Eligible Whistleblower's identity from disclosure wherever possible. It is illegal for a person to disclose the identity of an Eligible Whistleblower, or information that is likely to lead to the identification of a discloser, except:

- If a person discloses the identity of the Eligible Whistleblower to:
  - ASIC or a member of the Australian Federal Police;
  - A legal practitioner (for the purpose of obtaining legal advice); or
  - With the consent of the Whistleblower.
- A person can disclose the information disclosed in a disclosure with or without the Eligible Whistleblower's consent if:
  - The information does not include the Whistleblower's identity;
  - The person or entity has taken all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified from the information; and
  - It is reasonably necessary for investigating the issues raised in the disclosure.
- If an Eligible Whistleblower wishes to make a complaint about breach of confidentiality, they can do so:
  - With Melba as follows:
    - Employees can report the breach directly to their line manager or relevant senior manager, who will complete a Privacy and Data Breach Form, or alternatively employees can submit a complaint directly through FIMS;
    - Volunteers, suppliers of goods and services, relatives, dependents, and spouses can speak with any Melba staff member in line with Melba's Complaints Procedure to lodge a complaint or record a complaint online through Melba's website; or
    - If the above options are not appropriate, with a Board Member
  - With ASIC.

Unauthorised disclosure of any information relating to a report will be regarded seriously and may result in disciplinary action, up to the termination of a person's employment or engagement with or without notice.

#### Protection from detrimental acts or omissions

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

Where an Eligible Whistleblower makes a disclosure on reasonable grounds, Melba will act in the person's best interest to protect them from any reprisal, victimisation, adverse reaction or intimidation and ensure they will not be disadvantaged (including in their employment or engagement with Melba if applicable).

A person cannot engage in conduct that causes detriment to an Eligible Whistleblower (or another person) in relation to a disclosure if:

- The person believes or suspects that the Eligible Whistleblower (or another person) made, may have made, proposed to make or could make a disclosure that qualifies for protection; and
- That belief or suspicion is the reason or part of the reason for the conduct.

In addition, a person cannot make a threat to cause detriment to an Eligible Whistleblower (or another person) in relation to a disclosure.

A threat may be expressed or implied, or conditional or unconditional. The Eligible Whistleblower (or another person) who has been threatened in relation to a protected disclosure does not have to actually fear that the threat will be carried out.

- Detrimental conduct includes:
  - Dismissal of an employee or their employment.
  - Injury of an employee in their employment.
  - Alternation of an employee's position or duties to their disadvantage.
  - Discrimination between an employee and other employees of the same employer.
  - Harassment or intimidation of a person.
  - Harm or injury to a person, including psychological harm.
  - Damage to a person's property, reputation, business or financial position or any other damage to a person.
- Detrimental conduct does not include:
  - Administrative action that is reasonable for the purpose of protecting an Eligible Whistleblower from detriment; and
  - Managing an Eligible Whistleblower's unsatisfactory work performance in line with Melba's performance management framework.

### Compensation and other remedies

A Whistleblower can seek compensation and other remedies through the courts if:

- They suffer loss, damage or injury (detrimental conduct) because of a disclosure; and
- Melba failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Eligible Whistleblowers are encouraged to seek independent legal advice in relation to compensation and other remedies.

### Civil, criminal and administrative liability protection

An Eligible Whistleblower is protected from any of the following in relation to their Protected Disclosure:

- Civil liability (e.g., any legal action against the Eligible for breach of an employment contract, duty of confidentiality or any other contractual obligation);

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |



# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

- Criminal liability (e.g., attempted prosecution of the Eligible Whistleblower for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure); and
- Administrative liability (e.g., disciplinary action for making the disclosure).

The whistleblower protections do not grant immunity to a Whistleblower for any misconduct or unlawful conduct they engaged in that is revealed by their disclosure. In addition, where it is shown that an Eligible Whistleblower has knowingly made a false report of improper conduct, and it is evident that they know, or should have known the disclosure has no substance, then that conduct itself will be considered a serious matter and that person may be subject to disciplinary action which may include dismissal.

### SUPPORT AND PROTECTION FOR DISCLOSERS

Melba will support and protect Eligible Whistleblowers in the following ways:

#### Identity protection/confidentiality

If an Eligible Whistleblower makes a Protected Disclosure under this procedure, STOpline and/or the Eligible Recipient cannot disclose information that is likely to lead to the identification of the Eligible Whistleblower as part of its investigation process unless:

- The information does not include the Eligible Whistleblower's identity.
- Information relating to the Eligible Whistleblower's identity or other information that is likely to lead to the identification of the discloser is removed (e.g., their name, position title and other identifying details); and
- It is reasonably necessary for investigating the issues raised in the disclosure.

STOpline and/or the Eligible Recipient will not disclose the Eligible Whistleblower's identity unless:

- the Eligible Whistleblower consents to the disclosure; or
- the disclosure is required or authorised by law.

In each of the above circumstances, the matter will be discussed with the Eligible Whistleblower before any identifying information is provided.

#### Protection from detrimental acts or omissions.

Where an Eligible Whistleblower makes a protected disclosure, Melba will act in the Eligible Whistleblower's best interest to protect any person from any reprisal, victimisation, adverse reaction or intimidation and ensure they will not be disadvantaged (including in their employment or engagement with Melba, if applicable).

Melba will undertake the following to protect Eligible Whistleblowers from detrimental acts and omissions:

- Assess the risk of detriment against a disclosure and others as soon as possibly after receiving a disclosure.
- Provide staff with access to support services, such as EAP.
- Ensure that Eligible Whistleblowers are assisted in managing stress, time or performance impacts resulting from the disclosure or its investigation.
- Consider options for protecting a Eligible Whistleblower from the risk of detriment, such as allowing the Eligible Whistleblower to work from a different location or move to a different role or reassigning or relocating other staff involved in the disclosable matter (if applicable).

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |



# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

- Ensure that management are aware of their responsibilities to the Eligible Whistleblower under this policy.
- Ensure that the Eligible Whistleblower is aware of how to lodge a complaint if they have suffered detriment in relation to a disclosure, and that this complaint would be investigated separately to the disclosable matter and by someone who is not involved in dealing with the disclosable matter.

### PROCEDURE

The definitions in the Policy apply to this Procedure.

### HANDLING AND INVESTIGATING A DISCLOSURE

Melba takes all disclosures seriously. An Eligible Recipient will:

- assess disclosures to determine if they are a Protected Disclosure; and
- consider whether the disclosure should be reported to Melba's Whistleblower Protection Officer STOPLine, to assess and triage the disclosure.

STOPLine and/or the Eligible Recipient will assess each disclosure to determine if it qualifies for protection (i.e. it is a 'Protected Disclosure'). An Eligible Whistleblower may be asked for further information if the disclosure does not provide sufficient information to make this initial assessment.

Disclosures made under this policy will be treated confidentially. However, when an investigation is conducted it may be necessary to discuss the allegations with people such as Melba staff, external persons involved in the investigation process and, in appropriate circumstances, the police.

At some point in time, it will be necessary to disclose the allegation and the substance of a report to the person who is the subject of the report to ensure compliance with the principles of natural justice and procedural fairness. It should be noted, however, that in some circumstances if the Eligible Whistleblower does not consent to being identified, this might mean an investigation cannot take place.

Even when confidentiality is maintained, in some circumstances the source of the reported conduct may be obvious to a person who is the subject of a report.

Unauthorised disclosure of any information relating to a report will be regarded seriously and may result in disciplinary action, which may include the termination of a person's employment or engagement with Melba.

If a disclosure is not a Protected Disclosure, the eligible whistleblower is not entitled to a response, however Melba recognises that responding to disclosures demonstrates best practice and fostering a 'speak up' culture and will respond as appropriate in accordance with that position.

### Investigation

All disclosures of alleged or suspected improper conduct made under this procedure will be properly assessed and if appropriate, will be investigated in a timely manner. For a Protected Disclosure to be investigated, it must include sufficient information about the alleged conduct.

Melba may at its sole discretion:

- appoint internal or external investigators to investigate disclosures; and
- appoint legal counsel to assist with investigations.

The investigation will engage with the parties to be involved as respondents or witnesses, with the objective of locating evidence that either substantiates or refutes the claims made by the Eligible Whistleblower. Investigations will be conducted in a fair and discreet manner. The person appointed to

|  |   |
|--|---|
| <i>Title: Protected Disclosure (Whistleblowing) Policy and Procedure</i> | <i>Date Last Reviewed: 18 February 2025</i> |
| <i>Position Responsible: Chief Employee Experience Officer</i>           | <i>Next Review Date: 18 February 2027</i>   |

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

investigate the report will be required to follow Melba’s normal procedures for handling a complaint or disciplinary issue.

The whistleblower protection officer (STOPline) or the Eligible Recipient, whomever is most appropriate, is responsible for providing feedback to the Eligible Whistleblower on:

- the anticipated timeframe for the investigation process;
- maintaining contact during the course of the investigation, if the Eligible Whistleblower desires;
- notifying the Eligible Whistleblower on completion of the investigation.

Note: due to privacy considerations, Eligible Whistleblowers are not entitled to know the details of disciplinary action or consequences for people involved in the investigation. They may however be informed that the investigation is closed and provided general information on what action has been taken by Melba to address and prevent further harm.

At the end of the investigation, the investigator will report their findings to the CEO or, if the CEO is a subject of the protected disclosure, to the President of the Board who will determine the appropriate response. Melba will consider any relevant policies as part of disciplinary action that may be appropriate. Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly.

### ENSURING FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE

Melba provides support to individuals mentioned in disclosures by:

- handling disclosures confidentially to the greatest extent possible;
- objectively assessing disclosures;
- undertaking fair, objective and independent investigations where necessary and appropriate;
- advising individuals who are the subject matter of a disclosure of the allegations against them as and when required by principles of natural justice and procedural fairness and prior to any actions been taken; and
- providing employees with access to Melba’s EAP support services.

### ACCESSABILITY OF WHISTLEBLOWER POLICY



This policy and procedure will be accessible to staff via the MOS. It will also be included in employee induction packs and referred to in the employee handbook. The policy will also be posted on Melba’s external website, for those outside Melba to access.

### REFERENCES

|                         |   |
|-------------------------|---|
| <b>Related Policies</b> | <ul style="list-style-type: none"> <li>• Code of Conduct Policy</li> <li>• Employee Disciplinary Policy (MSS Inc)</li> <li>• Managing Discipline Policy- DSEAV</li> <li>• Internal Grievance and Dispute Resolution Policy</li> <li>• Sexual Harassment Policy</li> <li>• Health Safety and Wellbeing Policy</li> <li>• Incident Reporting – Persons Supported Policy</li> <li>• Complaints, Compliments &amp; Feedback Policy</li> </ul> |
|-------------------------|---|

# Protected Disclosure (Whistleblowing)

## POLICY AND PROCEDURE

|   |   |
|---|---|
|  <b>Related Procedures:</b>              | <ul style="list-style-type: none"> <li>• Incident reporting – Persons Supported Procedure</li> <li>• Complaints, Compliments &amp; Feedback Procedure</li> <li>• Suggested Change and Improvement Procedure</li> <li>• Internal Grievance and Issue Resolution Procedure</li> <li>• Employee Disciplinary Procedure (MSS Inc)</li> <li>• Managing Discipline Procedure- DSEAV</li> <li>• Sexual Harassment Procedure</li> <li>• Bullying Procedure</li> </ul> |
|  <b>Relevant Legislation/Standard(s)</b> | <ul style="list-style-type: none"> <li>• National Disability Insurance Scheme Act 2013</li> <li>• NDIS National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018</li> <li>• National Disability Insurance Scheme (Quality Indicators for NDIS Practice Standards) Guidelines 2018</li> </ul>   |