

Purpose

The purpose of this policy is for Autism SA (we, us, our) to give people the confidence to speak up and help us to identify any wrongdoing or misconduct.

Scope

This policy applies to all people that have an association with us. This may include, but is not limited to employees, contractors, students, volunteers, visitors, board members, clients, family members or guardians.

Policy statement

This policy is based on the following principles:

- Every employee or eligible person should have the chance to speak up or speak up anonymously when they feel we are not adhering to our values or not acting safely.
- Every employee or eligible person should have a place to report misconduct and be assured that every report will be heard and acted on, and that improvement based on the outcome of an investigation will be implemented
- We are committed to protecting people who make reports and their identity to our utmost ability, and they only need to reveal their identity if they choose to.
- Every report of misconduct will be investigated and documented.

Reportable behaviour

The following reportable behaviours covered under this policy include (but are not limited to):

- Fraud
- Illegal activities
- Corruption
- Dishonesty
- Unethical acts
- Creating an unsafe environment
- Discrimination
- Acting outside of policies, procedures or Code (such as a Code of Conduct)
- Any conduct that is detrimental to our organisation and could cause financial or non-financial loss.

Generally, personal work-related grievances are not included under this policy. These are managed internally through our grievances and disputes procedure.

Eligible person

The following people are considered an 'eligible person' under this policy:

- Employees, and any person associated with employees

- Contractors, consultants, service providers, suppliers, business partners, volunteers
- Former employees

Eligible recipient

If an eligible person feels they need to make a report, they must contact, one of our internal or external eligible recipients to qualify for protection as a whistleblower under this policy.

Internal eligible recipients can be contacted:

- in person, or by phone or email
 - our internal eligible recipient contact details are available from our website: www.autimsa.org.au/whistleblower
- through our internal dedicated whistleblower email address
 - whistleblower@autimsa.org.au
- making a disclosure through our [online misconduct disclosure](#) form

The following people are defined as our eligible recipients under this policy and can be contacted by email or phone.

- Executive Manager Corporate Services
 - Email: Monique Palmer
 - Phone: 0439 661 418
- Lauren Lewis, Executive Manager People, Culture and Safety
 - Email: llewis@autimsa.org.au
 - Phone: 0477 700 201
- Pamela Patane, Commercial Counsel
 - Email: legal@autimsa.org.au
 - Phone: 8379 6976

External eligible recipients that an eligible person can make a report directly to without reporting to us first, or where they feel we have not responded appropriately include.

- Australian Securities and Investments Commission (ASIC)
 - [Online misconduct report form](#)
 - Refer to [How ASIC handles whistleblower reports](#) for guidance on making an external disclosure and qualifying for protection
- Australian Prudential Regulation Authority (APRA)
 - Whistleblower email: whistleblower@apra.gov.au
 - Public interest disclosure email: PID@apra.gov.au

Identity protection

We respect and protect the identity of any person making a report. They can choose to remain anonymous when making a report, during an investigation and after the investigation is closed.

They can identify themselves at any time during the process if they choose to. They will never be forced to provide their identity.

If they do choose to disclose their identity, we will take all steps necessary to ensure they do not suffer any form of retaliation.

Where a report is made completely anonymously, we will try to investigate the report to the best of our ability, but in some cases, there may be limitations if the person chooses to remain anonymous.

Investigating a report

When a report is submitted the eligible recipient will assess the report and assess for investigation. We may choose to get an external third party to manage the investigation.

Relevant Executive Managers, the Chief Executive Officer and/or our Board of Directors may be alerted to the report as part of the investigation, or for reporting purposes.

Any information that could potentially identify an anonymous person will be held in the strictest confidence and will not be shared, unless we are compelled to do so by law.

As part of the investigation, we will keep the eligible person updated on the progress of the investigation. Due to our privacy policy, there may be information that is not able to be shared with the eligible person.

These updates can include:

- Confirmation of receipt of the report
- Commencement of the investigation
- Ongoing progress of the investigation
- Closure of the investigation
- Any improvements identified as a result of the investigation

Retaliation

A person making a report might be concerned that other staff, management or the organisation may retaliate against them. We will make sure that we protect the person making the report from any action that can be seen as retaliation for making a report.

This includes

- Being terminated or having their employment ceased
- Performance management
- Harassment or bullying
- Warnings or disciplinary action
- Discrimination

If the person making the report feels that they will be a victim of retaliation, there are steps we can take to protect them.

This may include the person

- Taking leave
- Being reassigned to other duties or another department

We do not tolerate any form of retaliation against any person making a report. Any employee or associated person found to be retaliating will face disciplinary action, which may include termination of employment with us.

Any other parties that may be witnesses or are involved in the investigation will also be protected from retaliation in the same manner as the person making the report.