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| Document Name: Speak Up Policy | |
| Document Number: 70090 | Effective Date: 28/8/17 |

Purpose:

Australian Home Care Services (AHC) is committed to the highest legal and ethical standards throughout all aspects of our organisation. AHC is determined to ensure that all employees act in accordance with AHC's Code of Conduct, policies and procedures, as well as relevant laws at all times.

AHC takes malpractice, unconscionable conduct, impropriety and endangering health or safety extremely seriously. AHC's Executive Management Team and Board are committed to preventing and detecting deviations from the Code of Conduct, and other AHC policies and procedures and to preventing illegal and other undesirable or unsafe conduct within our business. We will maintain an effective mechanism and processes to deal with legitimate concerns and / or complaints in a responsible and effective manner. To assist in detecting deviations from AHC policy and accepted practice, AHC has implemented an independent 24 hour *Speak Up* service with a national provider, Your Call.

This Policy seeks to promote a culture of honest and ethical behaviour by encouraging employees of AHC to report concerns about alleged wrongdoings freely, without fear of reprisal.

This policy aims to:

- Encourage employees and relevant persons to report an issue if they genuinely believe someone has contravened AHC's Code of Conduct, policies or the law;
- Encourage open and early identification of issues that maybe of a concern;
- Highlight that AHC takes these matters seriously and will investigate all reported misconduct or unethical behaviour;
- Outline the mechanisms and infrastructure in place for the reporting and investigation of matters raised by an employee or contractor speaking up;
- Ensure AHC's compliance with all relevant laws and Company policies; and
- Express AHC's commitment to its values and articulate its lack of tolerance for activities that place staff, clients or the organisation at risk.

The Speak Up service should only be utilised where the standard reporting systems have failed to adequately resolve the matter, or where an individual believes they have no other recourse. If in any doubt please report it.

Persons Affected:

This policy applies to all AHCS employees and relevant subcontractors, regardless of seniority, position or division, as well as stakeholders who have dealings with AHC. They will be known as the Concerned Party.

Definitions:

Employee - Any person who is employed or engaged in paid work within AHCS, or engaged as a volunteer, in a full-time, part-time, casual, or temporary capacity.

Detrimental action includes:

- Causing injury, loss or damage;
- Intimidation or harassment; and
- Discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business (including the taking of disciplinary action) or care.

Wrongdoing - covered by the policy which should be reported includes:

- Is dishonest, fraudulent or corrupt;
- Is an illegal breach of state or federal legislation;
- Unethical behaviour or wilfully breaching AHC's code of conduct or other ethical statements;
- Abuse or neglect of clients;
- Improper use of company assets;
- Improper use of social media;
- Financial malpractice, impropriety or fraud;
- Is potentially damaging to AHC or an AHC employee, client or contractor, such as unsafe work practices or substantial wasting of resources;
- Is within AHC's control which presents a significant danger to the health and safety of the environment;
- Misuse of confidential information or reporting;
- Conflicts of interest, insider trading, competition or anti-trust violations;
- Actions which would adversely affect AHC's reputation;
- Involves any other kind of serious impropriety.

Speaking Up - a disclosure of wrongdoing as defined by this Policy by a concerned party who wishes to avail themselves of the protections offered by this Policy.

Concerned Party – person who is making the disclosure under the protection of the Speak Up Policy.

Investigation Officer – the nominated appropriate AHC Executive to lead the investigation of matters reported to the external Speak Up provider. The AHC Executive must be independent to the area of report. In the case of allegations involving the CEO such matters will be reported to of the Chair of the Risk and Audit Committee to determine the best course of investigation.

Policy:

The Board of AHC (Board) recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include a mechanism whereby employees and others can report their concerns freely and without fear of reprisal or intimidation. The Speak Up Policy provides such a mechanism, and encourages the reporting of such conduct.

This Policy complements normal reporting and communication channels within AHC and provides an alternative means of reporting alleged or suspected wrongdoing where the usual channels appear to have failed or may be inappropriate.

Applicable Standards:

ACHS (Australian Council on Healthcare Standards) Criteria
AHPRA (Australian Health Practitioner Regulation Agency) Standards
HACC National Service Standard Reference

Relevant Legislation:

Fair Work Act 1998
Aged Care Act 1997
Whistleblower Protection Act 2001

Related Documents:

AHC Speak Up Procedure
AHC Speak Up Poster
Staff Grievance & Dispute Resolution Policy
AHC Complaints Management Process
AHC Contract of Employment
AHC Code of Conduct
AHC Policies and Procedures
AHC Privacy Policy