



Reporting of Wrongdoing Policy

IRT encourages a culture of accountability and empowerment. You should feel empowered to speak up and raise concerns, and be confident that your concerns will be heard.

You are encouraged to discuss any concerns about misconduct or an improper state of affairs or circumstances (called Reportable Conduct) with your direct manager or supervisor, except where you believe you may suffer detriment by doing so or you wish to use the protections offered by this Policy.

If you do not feel comfortable or able to discuss a concern about Reportable Conduct with your manager or supervisor, you may report your concern to an internal Disclosure Officer or our external Disclosure Service.

Introduction.

Integrity, respect and trust are core to our business and everything we do needs to be measured against the highest possible standard. IRT is committed to operating legally, ethically and properly, and to ensuring that you have a safe, reliable and confidential way of raising concerns about Reportable Conduct.

To make employees feel confident about raising concerns, we offer a reporting and investigation framework that is objective, confidential and independent, and protects you from reprisal action.

Current and former employees, volunteers, directors, officers, contractors and suppliers of IRT, and their relatives and dependants are all eligible to be Disclosers.

Compliance Requirements	<ul style="list-style-type: none">• <i>Corporations Act 2001 (Cth)</i>• <i>Aged Care Act 1997 (Cth)</i>
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Conduct Covered By This Policy.

For the purposes of this Policy, Reportable Conduct is misconduct or an improper state of affairs or circumstances including conduct by IRT, its employees, volunteers, directors, officers, contractors, suppliers or any other person dealing with the organisation which:

is dishonest, corrupt, unethical or improper

is illegal or criminal (including theft, fraud, drug sale/use, violence or threatened violence, damage to property)

contravenes legislation or constitutes an offence

does not comply with IRT policies, procedures or practice

puts the safety of individuals at risk

represents a danger to the public or financial system.

Policy Principles.

IRT has adopted the following principles in relation to its wrongdoing reporting program:

- a) IRT will protect the identity of Disclosers as far as possible and in compliance with its legislative obligations. Disclosers may also be entitled to protection under the *Corporations Act*.
- b) IRT will support and protect Disclosers who have reasonable grounds to suspect Reportable Conduct, from reprisal action as a result of making a Disclosure.
- c) IRT will conduct investigations in an objective, fair, reasonable, independent and confidential manner. Investigations will follow the rules of natural justice and procedural fairness.
- d) IRT may pursue legal or disciplinary action against a Discloser acting with vexatious or malicious intent, or who knowingly provides any part of a false disclosure. IRT may not extend protection to a whistleblower against reprisals in these circumstances.
- e) All Disclosures are to be treated on a confidential basis, subject to any regulatory or legislative requirements.
- f) Disclosers may choose to report anonymously. However, Disclosers are encouraged to identify themselves to assist with providing any further information and to ensure that protection and support can be provided.

Roles & Responsibilities.

Role	Responsibility
Employees, volunteers, directors, officers, contractors and suppliers	Report concerns regarding Reportable Conduct
Supervisors and managers	Refer any reports of Reportable Conduct to a Disclosure Officer Ensure that all employees, volunteers and contractors are aware of this policy and the avenues for reporting Reportable Conduct.
Group Head of Governance	Oversee the Wrongdoing Reporting Program Provide quarterly reporting to the Audit, Risk and Compliance Committee.
Disclosers	All reports must be made with reasonable grounds to suspect the Reportable Conduct Provide as much information as possible and any known details relating to the Reportable Conduct (e.g. date, time, location, name of person(s) involved, evidence such as documents or emails, possible witnesses, and any steps that may have been taken to report the matter elsewhere to try to resolve the concern).
Disclosure Service	Receive and assess Disclosures Refer Disclosures confidentially (and anonymously where required) to a Disclosure Officer.
Disclosure Officers	Receive and assess Disclosures

Role	Responsibility
	<p>Protect and support Discloser from detriment or a threat of detriment as a result of making a Disclosure</p> <p>Provide advice to anyone covered by this Policy prior to, during, or after a Disclosure</p> <p>Ensure parties involved in an investigation receive support</p> <p>Ensure that any disclosures which are fanciful, illogical or irrational are dismissed and the Discloser is notified of the outcome</p> <p>Ensure that any disclosures which are personal work-related grievances are referred for consideration under Policy PC 2.07 and the Discloser is notified.</p>
Investigation Officers	<p>Conduct investigations on Reportable Conduct, in a timely manner. This may include the use of internal or external investigative resources</p> <p>Keep the Discloser informed of the investigation's progress and investigation outcome, subject to privacy and confidentiality requirements</p> <p>Report the investigation outcome.</p>
Support Officers	Support Discloser and parties involved in an investigation.
Relevant Executive Leadership Team Member	Oversee implementation of any recommendations arising out of an investigation.

Making This Policy Available.

This Policy and the Reporting of Wrongdoing Procedure are to be made available to:

all current employees via the IRT Intranet

all current and former employees, volunteers, directors, officers, contractors and suppliers, and their relatives and dependants via electronic copy on request to

IRTcompliance@irt.org.au

Definitions.

Term	Definition
Discloser	Any person who makes a Disclosure under this Policy
Disclosure	The deliberate and voluntary disclosure or attempted disclosure of information that alleges the actual or suspected existence of Reportable Conduct in accordance with this Policy or the <i>Corporations Act</i> .
Disclosure Officer	IRT employees who are designated in the Reporting of Wrongdoing Procedure to receive and assess Disclosures
Disclosure Service	An independent, external provider designated in the Reporting of Wrongdoing Procedure to receive and assess Disclosures
Investigation Officer	IRT employees who are designated in the Reporting of Wrongdoing Procedure to investigate Disclosures

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Personal Work-related Grievance	Includes: an interpersonal conflict a decision that does not involve a breach of workplace laws a decision about the engagement, transfer or promotion of a person a decision about the terms and conditions of engagement of a person a decision to suspend or terminate the engagement of a person, or otherwise to discipline them
Reportable Conduct	Misconduct or an improper state of affairs or circumstances; including conduct that is dishonest, corrupt, unethical, improper, illegal or criminal, contravenes legislation, constitutes an offence, does not comply with IRT policies, procedures or practice, puts the safety of individuals at risk or represents a danger to the public or financial system excluding a personal work-related grievance
Support Officer	IRT employee designated by a Disclosure Officer to support Disclosers and other parties involved during the reporting and investigation of a Disclosure. Support may also be obtained confidentially through the Employee Assistance Program.