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1. Introduction

UnitingSA Ltd ABN 29 335 570 988 (“**UnitingSA**”) is a purpose driven and values-based organisation, committed to promoting and supporting a culture of compliance and proper ethical behaviour. UnitingSA encourages whistleblowers to assist in maintaining the legal, proper and ethical operations of UnitingSA by reporting the non-compliant actions of others.

2. Purpose

The purpose of this Whistleblower Policy (“**Policy**”) is to:

- 2.1. encourage whistleblowers to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- 2.2. outline the mechanisms for the reporting and investigation of reported matters;
- 2.3. outline the measures in place to protect and ensure the fair treatment of whistleblowers;
- 2.4. provide information about how the Policy will be made available to whistleblowers;
- 2.5. help to ensure that UnitingSA maintains the highest standards of ethical behaviour and integrity, and enable the delivery of consistent person centred, safe, and quality care to our clients; and
- 2.6. outline procedures and protections that apply to whistleblowers under the Corporations Act in relation to the reporting of possible breaches of the Corporations Legislation, the Aged Care Act in relation to breaches of the Aged Care Act, and the NDIS Act in relation to breaches of the NDIS Act.

3. Scope

- 3.1. This Policy applies to those identified in Section 0 – Who Can Report (below), who wish to report Reportable Conduct regarding UnitingSA’s activities. For the purposes of this Policy, these individuals will be referred to as ‘whistleblowers’.
- 3.2. This Policy should be read alongside other relevant policies and procedures aimed at compliance with other legislative requirements. This includes:
 - 3.2.1. Privacy Policy and the Notifiable Data Breach Procedure
 - 3.2.2. Board Director Code of Conduct
 - 3.2.3. Employee Code of Conduct
 - 3.2.4. Volunteer Code of Conduct
 - 3.2.5. Student Code of Conduct
 - 3.2.6. Conflict of Interest Procedure

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- 3.2.7. Mandatory Notification Procedure (Reporting Harm & Risk of Harm to Children and Young People)
- 3.2.8. Fraud and Corruption Prevention Policy
- 3.2.9. Work, Health & Safety and Injury Management Policies
- 3.2.10. Independent Commissioner Against Corruption Reporting Procedure
- 3.2.11. Modern Slavery Policy
- 3.2.12. Employee Grievance Resolution Procedure
- 3.3. This Policy will be monitored and updated to reflect best practice, professional practice standards and guidelines, regulatory, and legislative requirements.

4. Definitions

Term	Definition
Aged Care Act	means the <i>Aged Care Act 2024 (Cth)</i> and associated rules and regulations.
ASIC	means the Australian Securities and Investments Commission.
Corporations Act	means <i>Corporations Act 2001 (Cth)</i> .
Corporations Legislation	has the meaning given to that term in section 9 of the Corporations Act and includes the Corporations Act and <i>Australian Securities and Investments Commission Act 2001 (Cth)</i> , the <i>Banking Act 1959</i> , the <i>Financial Sector Act (Collection of Data) Act 2001</i> , the <i>Insurance Act 1973</i> , the <i>National Consumer Credit Protection Act 2009</i> , and the <i>Superannuation Industry (Supervision) Act 1993</i> .
Detriment	includes (without limitation) dismissal of an employee, victimisation, injury of an employee in his or her employment, alteration of an employee's position or duties to his or her advantage, discrimination between an employee and other employees of the same employer, alteration or withdrawal of NDIS services provided to a participant, 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, any other damage to a person.
Key Personnel	is as defined in s 11A of the NDIS Act.
NDIS	means the National Disability Insurance Scheme.
NDIS Act	means the <i>National Disability Insurance Scheme Act 2013 (Cth)</i> .
Registered Provider	is as defined in section 11(2) of the Aged Care Act.
Responsible Person	is as defined in section 12 of the Aged Care Act.
Reportable Conduct	is as defined in Section 6. of this Policy.

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Taxation Administration Act	means the <i>Taxation Administration Act 1953</i> (Cth).
Whistleblower	means an individual or entity who meets the definition in Section 5 of this Policy and who alerts UnitingSA and/or a regulatory authority to Reportable Conduct within UnitingSA.
Whistleblower Protection Officer	means the person nominated by UnitingSA whose key responsibilities include protecting whistleblowers who report concerns under this Policy as identified in Section 7.1 of this Policy.

5. Who Can Report

- 5.1. An officer, director, employee, volunteer, student or contractor, whether current or former or permanent, part time, fixed term or temporary.
- 5.2. A supplier of goods or services to, or on behalf of, UnitingSA (whether paid or unpaid) including their current or former employees, contractors, consultants, service providers or business partners.
- 5.3. An associate of UnitingSA.
- 5.4. A relative, dependant or spouse of an individual in Sections 5.1 to 5.3.
- 5.5. A recipient of funded aged care services from UnitingSA and supporters of those individuals (for example, family members, representatives, carers, advocates), and any other persons who have a complaint or would like to give feedback about UnitingSA's delivery of funded aged care services.
- 5.6. A person receiving NDIS support or services from UnitingSA or a nominee, family member, carer, independent advocate or significant other of that recipient.

6. What is Reportable Conduct?

Reportable Conduct means conduct that is illegal, unacceptable or undesirable, or the concealment of such conduct and includes conduct that:

- 6.1 is against the law or is a failure by UnitingSA to comply with any legal obligation including under the Corporations Legislation (see Section 17 for more information), Aged Care Act (see Section 18 for more information) or NDIS Act (see Section 19 for more information);
- 6.2 is unethical or breaches UnitingSA's policies and procedures (including the Code of Conduct Policies, as stated in Section 3.2);
- 6.3 is dishonest, fraudulent or corrupt, or amounts to coercion, harassment, victimisation or discrimination;
- 6.4 is misleading or deceptive conduct of any kind (including conduct or representations that amount to improper or misleading accounting or financial reporting practices either by, or affecting, UnitingSA);

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- 6.5 is potentially damaging to UnitingSA, an employee or a third party, including unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- 6.6 may cause financial loss to UnitingSA or damage its reputation or be otherwise detrimental to UnitingSA;
- 6.7 may be misconduct, an improper state of affairs or circumstances in relation to the tax affairs of UnitingSA (see Section 20 for more information); or
- 6.8 involves any other serious impropriety.

Personal work-related grievances are not Reportable Conduct. Personal work-related grievances include:

- 6.9 an interpersonal conflict between a whistleblower and another employee of UnitingSA;
- 6.10 a decision by UnitingSA that does not involve a breach of workplace laws;
- 6.11 a decision by UnitingSA about the engagement, transfer or promotion of the whistleblower;
- 6.12 a decision by UnitingSA about the terms and conditions of engagement of the whistleblower; or
- 6.13 a decision by UnitingSA to suspend or terminate the engagement of a whistleblower or otherwise discipline the whistleblower.

Personal work-related grievances should be reported to UnitingSA in accordance with *UnitingSA's Employee Grievance Resolution Procedure*.

7. Who to report Reportable Conduct to?

- 7.1 A whistleblower can report Reportable Conduct via any of the following mechanisms:
 - 7.1.1 A nominated UnitingSA Whistleblower Protection Officer, via speakup@unitingsa.com.au:
 - Policy & Support Partner (People Partnerships & Quality) Ph. 08 8440 2255
 - Senior Manager People Experience – Ph. 0476 883 069
 - Senior Manager Great Client Experience – Ph. 0427 334 360
 - 7.1.2 A member of the Executive Team at UnitingSA.
 - 7.1.3 Any of the persons or entities listed in Section 17, 18 and 19 of this Policy.
- 7.2 If a whistleblower requires additional information before reporting conduct, they may contact the Whistleblower Protection Officer or a legal practitioner.

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8. How to report Reportable Conduct

A whistleblower can report Reportable Conduct by any means the whistleblower elects including, but not limited to, telephone, email or post via the mechanisms outlined in Section 7 above. A report will be confidential and secure and can be made anonymously and outside of business hours via speakup@unitingsa.com.au

9. Anonymity

A whistleblower can elect to remain anonymous while making a disclosure, over the course of an investigation, and after the investigation is finalised. A whistleblower is not obliged to answer any questions that they feel could reveal their identity at any time. It may be difficult for UnitingSA to properly investigate a disclosure where an anonymous disclosure is given and no means of contacting the whistleblower are provided. UnitingSA will protect the anonymity of whistleblowers using various mechanisms (for example, using pseudonyms for the whistleblower's name).

10. What happens when UnitingSA receives disclosures?

- 10.1 UnitingSA will acknowledge receipt of a disclosure within a reasonable period provided that the whistleblower can be contacted. The Whistleblower Protection Officer, alongside any legal practitioners appointed to assist in the investigation, will assess the disclosure and determine whether the disclosure is Reportable Conduct and whether an investigation is required.
- 10.2 All disclosures of Reportable Conduct will be investigated by a trained person appointed by UnitingSA in a timely manner.

11. What is the role of the Whistleblower Protection Officer?

The Whistleblower Protection Officer is responsible for:

- 11.1 receiving a disclosure of Reportable Conduct from a whistleblower;
- 11.2 coordinating the provision to UnitingSA of information from the whistleblower for the purposes of an investigation into that report; and
- 11.3 reporting investigation updates back to the whistleblower, including upon the finalisation of the investigation, and providing support for the whistleblower by protecting and safeguarding the whistleblower and reviewing the integrity of the investigation process.

The Whistleblower Protection Officer will at all times have direct and unrestricted access to reasonable financial, legal and operational assistance when this is required.

12. The Investigation Process

- 12.1 If an investigation is required, UnitingSA will determine:
- 12.1.1 the nature and scope of the investigation;
 - 12.1.2 who should lead the investigation and whether an external investigator or legal advice is required to support the investigation;
 - 12.1.3 any risks of detriment being caused to a whistleblower and any steps required to be taken to protect the whistleblower, and any steps that need to be taken to ensure the fair treatment of individuals mentioned in a disclosure; and
 - 12.1.4 the anticipated timeframe for completion of the investigation, noting that timeframes will vary depending on the content and complexity of the disclosure. UnitingSA intends to complete investigations in a timely manner.
- 12.2 The person appointed to investigate a disclosure of Reportable Conduct is responsible for coordinating the investigation, documenting and handling all matters in relation to the disclosure and investigation and finalising all investigations.
- 12.3 The investigator will have direct and unrestricted access to reasonable financial, legal and operational assistance when this is required for any investigation.

13. Rights of the Subject of Investigation

- 13.1 A person who is the subject of an investigation is entitled to be:
- 13.1.1 informed as to the substance of a disclosure as and when required by principles of natural justice and procedural fairness; and
 - 13.1.2 given a reasonable opportunity to put their case to the person who is investigating the disclosure.
- 13.2 All investigations undertaken will be handled confidentiality (as practically and appropriately in the given circumstances) and undertaken in an objective, fair and independent manner.
- 13.3 A person who is the subject of an investigation is entitled to access the support services outlined in Section 21 of this Policy.

14. Whistleblower will be kept appropriately informed

The whistleblower will be kept appropriately informed of the progress of actions taken in respect of their disclosure. At the conclusion of the investigation, they will be informed of the outcome, subject to considerations of privacy and confidentiality.

15. Confidentiality and Recording Keeping

- 15.1 UnitingSA has legal obligations to protect the confidentiality of a whistleblower. UnitingSA and any persons receiving disclosures will not disclose the particulars of disclosures that would suggest the identity of the whistleblower without obtaining the whistleblower's prior consent, subject to any applicable laws. Any disclosures made with the whistleblower's consent will be made on a strictly confidential basis. All files and records created from an investigation will be retained under strict security.
- 15.2 It is not a breach of confidentiality obligations to disclose the identity of the whistleblower if the whistleblower consents to their identity being disclosed.
- 15.3 Any disclosures made with the whistleblower's consent will be made on a strictly confidential basis. All files and records created from an investigation will be retained under strict security.
- 15.4 Any complaints about a breach of confidentiality can be made to the Whistleblower Protection Officer as well as any of the authorities outlined in Section 17.1.2.1 below.

16. General protections for whistleblowers

- 16.1 Whistleblowers who have reasonable grounds to suspect that information concerns misconduct and report a concern under this Policy must not be personally disadvantaged by Detriment.
- 16.2 The whistleblower is also protected from civil, criminal or administrative liability in accordance with Section 17, and 18.2 of this Policy.
- 16.3 The whistleblower is not granted immunity for any misconduct which is revealed as part of their disclosure. However, if a whistleblower is actively cooperating in the investigation, there may instances where the fact they have made a disclosure is considered a mitigating factor when determining any actions taken against them for their misconduct.
- 16.4 A whistleblower will still be protected in accordance with this Section 16 if the disclosure turns out to be incorrect.

17. The Corporations Legislation

17.1 Eligibility for Protections under the Corporations Legislation

The Corporations Act provides protections in relation to the reporting of possible contraventions of the Corporations Legislation, an offence against any other law of the Commonwealth (punishable by twelve (12) months imprisonment or more) or conduct which represents a danger to the public or the financial system.

A disclosure of information by a person qualifies for protection under the Corporations Act if:

- 17.1.1 the whistleblower is an Eligible Whistleblower;

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- 17.1.2 the disclosure, which may be made anonymously, is made to:
 - 17.1.2.1 Australian Securities and Investment Commission (ASIC), Australian Prudential Regulation Authority (APRA), the Australian Taxation Office (ATO) or a prescribed authority;
 - 17.1.2.2 UnitingSA's auditor or a member of the audit team;
 - 17.1.2.3 an officer or senior manager of UnitingSA;
 - 17.1.2.4 a person authorised by UnitingSA to receive disclosures of that kind (that is, the Whistleblower Protection Officer);
 - 17.1.2.5 a legal practitioner for the purpose of obtaining representation or advice;
 - 17.1.2.6 in the case of "emergency disclosure" (where the disclosure has previously been made and the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of people, or to the natural environment) to a member of Parliament (Commonwealth or State) or a journalist; or
 - 17.1.2.7 in the case of "public interest disclosure" (where the disclosure has previously been made and the discloser believes no action is being taken in relation to their disclosure and the discloser has reasonable grounds to believe that making further disclosure of the information is in the public interest) to a member of Parliament (Commonwealth or State) or a journalist.
- 17.1.3 the whistleblower has reasonable grounds to suspect misconduct, an improper state of affairs or circumstances relating to UnitingSA. This includes, but is not limited to:
 - 17.1.3.1 a contravention of the Corporations Legislation by UnitingSA or any of its officers or employees;
 - 17.1.3.2 an offence against any other law of the Commonwealth (punishable by twelve (12) months imprisonment or more); or
 - 17.1.3.3 conduct which represents a danger to the public or the financial system.

17.2 Corporations Act Protections

If these conditions are met, the Corporations Act provides the following protections to the whistleblower:

- 17.2.1 a person cannot engage in conduct that causes Detriment to a whistleblower;
- 17.2.2 the whistleblower is not subject to any civil or criminal liability for making the disclosure (including disciplinary action). The whistleblower is not, however, protected from civil or criminal liability for any of his/her misconduct that may be revealed by the disclosure;
- 17.2.3 no contractual or other remedy may be enforced or exercised against a whistleblower on the basis of the disclosure and a contract to which the

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whistleblower is a party may not be terminated on the basis that the disclosure constitutes a breach of the contract;

- 17.2.4 if UnitingSA purports to terminate the employment of a whistleblower on the basis of the disclosure, a court may reinstate the whistleblower to the same position or a position at a comparable level;
- 17.2.5 the information is not admissible in evidence against the whistleblower in criminal proceedings (unless the information is false);
- 17.2.6 the whistleblower is protected from actual or threatened Detriment because of the disclosure and may receive compensation for any damage caused by such Detriment;
- 17.2.7 the whistleblower will not be required to pay the costs of any other party in court proceedings for compensation unless acting vexatiously or without reasonable cause in taking the proceedings, or acted unreasonably causing the cost to be incurred;
- 17.2.8 an apology may be ordered to be given to the whistleblower or an injunction granted by the court to prevent, stop or remedy any detrimental conduct or its effects; and
- 17.2.9 subject to limited exceptions, the person to whom the disclosure is made must not disclose the substance of the report, the whistleblower's identity or information likely to lead to the identification of the whistleblower.

UnitingSA are committed to full compliance with these protective provisions.

18. The Aged Care Act

18.1 Eligibility for Aged Care Act Protections

The Aged Care Act provides protections to whistleblower's whereby:

- 18.1.1 an Eligible Whistleblower reports Reportable Conduct to one of the following recipients:
 - 18.1.1.1 the Commissioner, Complaints Commissioner or a member of staff at the Aged Care Quality and Safety Commission;
 - 18.1.1.2 the System Governor (being the secretary of the Department of Health and Aged Care), or an official of the Department of Health or Aged Care;
 - 18.1.1.3 the Registered Provider (i.e., UnitingSA, which can be reported to in accordance with this Policy);
 - 18.1.1.4 a Responsible Person of the Registered Provider;
 - 18.1.1.5 an aged care worker of the Registered Provider;
 - 18.1.1.6 a police officer;

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18.1.1.7 an independent aged care advocate; or

18.1.2 any other eligible recipient outlined in the Aged Care Act;

18.1.3 the disclosure is made orally or in writing (and whether made anonymously or not); and

18.1.4 the Eligible Whistleblower has reasonable grounds to suspect that the information indicates that UnitingSA may have contravened a provision of the Aged Care Act.

18.2 Aged Care Act Protections

If the conditions are met, the Aged Care Act provides the following protections to the whistleblower:

18.2.1 the whistleblower is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;

18.2.2 no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the individual on the basis of the disclosure; and

18.2.3 a person cannot engage in conduct that causes Detriment to a whistleblower. The whistleblower is protected from actual or threatened Detriment because of the disclosure.

UnitingSA are committed to full compliance with these protective provisions.

19. The NDIS Act

19.1 Eligibility for NDIS Act Protections

The NDIS Act provides protections to whistleblowers whereby:

19.1.1 an Eligible Whistleblower reports Reportable Conduct to one of the following recipients:

19.1.1.1 Commissioner of the NDIS Quality and Safeguards Commission;

19.1.1.2 National Disability Insurance Agency; or

19.1.1.3 any Key Personnel of UnitingSA;

19.1.2 the Eligible Whistleblower informs the recipient of their name prior to making the disclosure;

19.1.3 the Eligible Whistleblower has reasonable grounds to suspect that the information in the disclosure indicates that UnitingSA has, or may have, contravened the NDIS Act; and

19.1.4 the disclosure is made in good faith.

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19.2 NDIS Act Protections

If the conditions are met, the NDIS Act provides the following protections to the whistleblower:

- 19.2.1 the whistleblower is not subject to any civil or criminal liability for making the disclosure;
- 19.2.2 no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the whistleblower on the basis of the disclosure; and
- 19.2.3 a person cannot engage in conduct that causes Detriment to a whistleblower. The whistleblower is protected from actual or threatened Detriment because of the disclosure.

UnitingSA are committed to full compliance with these protective provisions.

20. Taxation Administration Act

In addition to the protections afforded by the Corporations Act, Aged Care Act and the NDIS Act, whistleblowers are also protected under the Taxation Administration Act in relation to disclosures concerning the tax affairs of UnitingSA. For more information about the protections available under the tax whistleblower regime and additional reporting avenues, please visit the ATO website (<https://www.ato.gov.au/about-ato/whistleblowers>).

21. Support

The following support mechanisms are available for whistleblowers who make a disclosure of Reportable Conduct and other parties affected by a disclosure of Reportable Conduct under this Policy:

- For UnitingSA employees: Access to UnitingSA's Employee Assistance Program (EAP): Human Psychology EAP Provider (Via Telephone: 1300 277 924 120 or 29 Dequetteville Terrace, Kent Town SA 5067)
- For all affected parties: Third party support providers such Lifeline (13 11 14) or Beyond Blue (1300 22 4636).

22. Other Matters

22.1 Amendment of policy

This Policy can only be amended with the approval of the Board. This Policy will be reviewed annually by the Board.

22.2 Adoption of Policy

- 22.2.1 UnitingSA will disseminate this Policy and accompanying factsheets to employees and communicate any Policy amendments to employees.

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- 22.2.2 Our aged care workers and our aged care residents will be reminded of the whistleblower grievance mechanisms through various avenues including, but not limited to, fact sheets, the monthly staff newsletter, and posters.
- 22.2.3 UnitingSA will ensure that this Policy is on UnitingSA's website and will be available for all employees via the intranet.

23. Legislative References / Standards

- 23.1 Corporations Act 2001 (Cth)
- 23.2 Aged Care Act 2024 (Cth)
- 23.3 National Disability Insurance Scheme Act 2013 (Cth)
- 23.4 Taxation Administration Act 1953 (Cth)
- 23.5 Privacy Act 1998 (Cth)
- 23.6 Australian Securities and Investments Commission Act 2001 (Cth)
- 23.7 Banking Act 1959
- 23.8 Financial Sector Act (Collection of Data) Act 2001
- 23.9 Insurance Act 1973
- 23.10 National Consumer Credit Protection Act 2009
- 23.11 Superannuation Industry (Supervision) Act 1993

24. Related Documents

- 24.1 Privacy Policy and the Notifiable Data Breach Procedure
- 24.2 Board Director Code of Conduct
- 24.3 Employee Code of Conduct
- 24.4 Volunteer Code of Conduct
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24.10 Independent Commissioner Against Corruption Reporting Procedure

24.11 Modern Slavery Policy

24.12 Employee Grievance Resolution Procedure

25. Document Control

25.1 All records must be retained in accordance with legislation.

Version	Description of change	Approved by	Date approved	Owner position title
1.0	- New Policy drafted to meet the changed requirements of the Aged Care Act (2024) - Supersedes the <i>Disclosures of Reportable Information (Whistle Blower Protection) Procedure, Version 6.0: February 2022</i>	Board	26 June 2025	Chief People, Partnerships & Quality Officer
2.0	Updates made to the Policy to include NDIS Act Whistleblower Provisions	Board	28 August 2025	Chief People, Partnerships & Quality Officer
3.0	Updates to remove the use of a third-party to receive whistleblower disclosures. The Aged Care Rules 2025, do not allow for this to occur. Note – a whistleblower can still seek legal guidance from a third-party and a third-party can be engaged to run an investigation (such as a legal firm or trained investigator).	Board	30 October 2025	Chief People, Partnerships & Quality Officer
3.1	Senior Manager People Experience phone number updated	N/A	N/A	N/A

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