

Speak Out Procedure

1. Applies to

This Procedure applies to:

- all Calvary employees.

2. Purpose

The purpose of this procedure is to provide a process for all employees to report corrupt, illegal, unethical or undesirable actions, omissions or behaviour. We aim to make employees feel confident about raising concerns, by offering a reporting mechanism that is confidential, objective and independent, and protects employees from reprisal or disadvantage in their workplace.

The Speak Out hotline helps support Calvary's business objectives and promotes its values and compliance. Through the provision of an effective Speak Out hotline Calvary empowers employees to take the initiative and encourage the reporting of matters that may cause harm, financial or non-financial loss or damage to company assets or our reputation.

Whilst internally Calvary has established lines of communication for reporting ethical and compliance issues, the Speak Out process is provided by an external service offering 24/7 coverage to the whole Calvary group.

The Speak Out hotline is a demonstration of sound corporate governance at Calvary. It is only through knowledge of issues and problems within Calvary that the organisation can act to protect the interests of employees, people we serve, stakeholders and members of the public, alike.

3. Responsibilities

Employees

All employees are expected to use the Speak Out Hotline responsibly in accordance with this procedure and act in the best interest of Calvary at all times and to report any suspected corrupt, illegal, unethical or undesirable actions, omissions or behaviour in the workplace.

4. Procedure

4.1 The Speak Out Hotline

The Speak Out hotline is a confidential 24/7 service and can be accessed by calling **1800 582 551**.

4.2 What should be Reported to the Speak Out Hotline?

Corrupt, illegal, unethical or undesirable behaviour, including but not limited to:

- conduct which is unethical, illegal, dishonest, fraudulent or corrupt
- acts or omissions which may cause financial or non-financial loss to Calvary, damage to our reputation or breach an internal policy

- acting outside proper financial accounting, reporting and auditing standards
- harassment, discrimination, victimisation, bullying
- unsafe work practices, environmental or health risks
- unsafe or potentially dangerous clinical practices
- behaviour that contravene Calvary's Code of Conduct, policies, or the law.

4.3 What Should not be Reported to the Speak Out Hotline?

Issues or grievances with regard to matters arising in the normal course of operations should not be reported as part of the Speak Out program. These should be dealt with via normal reporting processes to your manager and where required, Human Resources in line with Calvary grievance procedure.

4.4 Identifying and Reporting Unacceptable Behaviour

If you become aware of any unacceptable behaviour, you should first:

- take the matter up with your immediate manager, or if you prefer,
- report the matter to your CEO/General Manager, Human Resources Manager, Director of Mission or the National Director for your area of the business.

Only if the matter is considered too sensitive or cannot be resolved by the above processes or involves management, you should contact the Speak Out hotline number to file a confidential report.

4.5 About the Speak Out Hotline

The Speak Out hotline is serviced by an external provider, LifeWork. LifeWork provides a confidential 24/7 service to all employees to report concerns about possible violations of law, professional and ethical standards and conduct or organisational policy. The hotline will support Calvary's ongoing commitment to institutional integrity and maintaining the highest standards of ethical business practices.

The Speak Out hotline enables Calvary to effectively deal with reports from callers in a way that will keep the identity of that employee entirely confidential and provide for the secure storage of the information provided. The identity of the caller will only be divulged if the caller provides explicit approval. If, however, counselling or support are required as a result of a disclosure, LifeWork would ensure appropriate referrals were facilitated in a location suitable to the employee. The Speak Out hotline is designed for individuals to report possible illegal, unethical or improper conduct when the normal channels of communication are ineffective or impractical due to the circumstances.

The Speak Out hotline is intended to be a valuable addition to other mechanisms currently available for reporting issues of ethics and compliance. It will not replace existing channels for raising concerns or providing feedback on issues and activities within the workplace.

The Speak Out hotline will ensure effective communication strategies that protect the caller's identity whilst providing informative reports to meet Calvary's expectations. The Speak Out hotline offers:

- Confidentiality
- 24 x 7 x 365 access
- Script based on Calvary's requirements (refer below)
- Counselling referral offered to each caller
- Dedicated national, toll free 1800 number
- Prompt and streamlined process delivering simple and straightforward service to Calvary
- Secure data capture and recording

- De-identified notifications to key personnel within 24 hours
- De-identifying periodic consolidated reporting (monthly, quarterly and yearly)

4.6 Confidentiality

An essential element of the Speak Out hotline is the protection of the caller and their confidentiality. Employees should feel confident in contacting the hotline without fear of reprisal. Callers will be asked if they wish to identify themselves or remain anonymous; callers are not obligated to provide identifying information. Regardless of whether the person chooses to remain anonymous, the report on the call and any investigation will be handled in a confidential manner consistent with applicable laws and the need to investigate and take corrective action. The ability to investigate fully may be restricted if the caller chooses to remain anonymous.

4.7 The Speak Out Hotline Interview Script

OPERATOR SCRIPT	
<p>“Good Morning / Afternoon LifeWork Speak Out Hotline, _____ speaking”</p> <p>“Any information you provide today will be dealt with in strict confidence. This hotline is a fully independent and confidential service offering partners and employees of Calvary with the opportunity to report actual or suspected improper or unacceptable conduct without fear of reprisal. Your details and information will not be disclosed unless you provide consent.”</p>	
CALL INTAKE DETAILS	
Call Date:	
Call Time:	
CALLER IDENTIFICATION DETAILS	
Caller Code:	
Name:	
Organisation:	
Department:	
Location:	
Contact Telephone Numbers:	Mobile: Preferred No. <input type="checkbox"/> Home: Preferred No. <input type="checkbox"/> Work: Preferred No. <input type="checkbox"/>
Would you be happy for LifeWork to call you should any further details be required?	Yes <input type="checkbox"/> No <input type="checkbox"/>

IDENTIFICATION OF INCIDENT				
<u>MANDATORY</u>				
Date of Incident:				
Where did the incident occur:				
Detail of the incident you have witnessed and how you believe it to be in breach of the organisation's policy, regulation or legislative requirements?				
Do you think that this incident relates to ethics and compliance or bullying and harassment or risk of harm?	Ethics and compliance	<input type="checkbox"/>	Complete section A	Bullying and harassment
				<input type="checkbox"/>
				Complete Section B

OPERATOR SCRIPT
“The following questions may appear repetitive; however, they are relevant to ensuring that comprehensive information is obtained during this process.”

If incident is related to **ETHICS AND COMPLIANCE**, proceed to Section A questions.

If incident is related to **BULLYING AND HARASSMENT** - Risk of harm, proceed to Section B questions.

A. ETHICS AND COMPLIANCE	
How did this incident come to your attention?	
From your understanding is this a breach of the Catholic Health of Australia, Code of Ethical Standards? If yes, what is the nature of the breach?	
From your understanding is it a one-off or repeated breach?	
From your understanding is this a breach of a Public Sector Management Act/Code or Standard in your jurisdiction? If yes, what is the nature of the breach?	
Can you provide the date and time of any additional breaches that took place?	
Are you able to disclose the name of the individual?	
Is there more than one individual involved?	

In which office/area is the individual located?	
If customer or supplier related, which customer or supplier does this effect?	
If this incident is concerning theft or fraud, what do you believe is the value of the money involved?	

Can you identify any evidence that would assist Calvary in an investigation of this incident?	
Would you consent to LifeWork providing your personal contact details to an independent member of Calvary's leadership group should they wish to make contact with you?	Yes <input type="checkbox"/> No <input type="checkbox"/>

B. BULLYING AND HARASSMENT/RISK OF HARM		
Just to clarify is it yourself or another individual who is the perceived victim of an alleged bullying and harassment incident or risk of harm?	Caller is perceived victim <input type="checkbox"/>	Caller is witness <input type="checkbox"/>

B.1. CALLER IS ALLEGED VICTIM		
Who is the alleged offender, and what is their role and office location?		
Has this or a similar alleged incident occurred previously? If so, on how many occasions involving this individual?		
Can you think of any further information that is relevant to the alleged incident(s)?		
Would you consent to LifeWork providing your personal contact details to the HR Manager should they wish to make contact with you?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<u>If YES:</u> Would you like to speak with a senior Psychologist who can	Yes <input type="checkbox"/>	No <input type="checkbox"/>

support you through this and possibly assist you to approach your People & Development Manager?		
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B.2. CALLER IS WITNESS		
If you are not directly involved, how did this incident come to your attention?		
Who is the alleged offender, and what is their role and office location?		
How many other such incidents have you observed or heard about?		
Can you think of any further information that is relevant to the alleged incident(s)?		
Would you consent to LifeWork providing your personal contact details to the HR Manager should they wish to make contact with you?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<u>If YES:</u> Would you like to speak with a senior Psychologist who can support you through this and possibly assist you to approach your People & Development Manager? (LifeWork National Contact Centre: 1300 361008)	Yes <input type="checkbox"/>	No <input type="checkbox"/>

4.8 After the Call

Through a structured feedback process, LifeWork will report all calls from the Speak Out hotline directly back to Calvary's key representative through an Ethics and Compliance Hotline Form (refer appendix1).

Level 1 - Extreme Risk LifeWork notify	Level 2 - High Risk LifeWork notify
<ul style="list-style-type: none"> NCEO, NLT member of stream, CEO of Stream, NDPOD and NHRA If applicable, LifeWork notify Police, Ambulance or Fire service 	<ul style="list-style-type: none"> NLT member of stream, CEO of Stream, NDPOD and NHRA If applicable, LifeWork notify Police, Ambulance or Fire service
Level 3 - Moderate Risk LifeWork notify	Level 4 - Low Risk LifeWork Notify

<ul style="list-style-type: none"> • CEO of Stream, NDPOD and NHRA 	<ul style="list-style-type: none"> • CEO of Stream, NDPOD and NHRA
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This will take place within 24 hours of taking the call and be in accordance with the law, ethical rules, Calvary Risk and SAC Rating Matrix and Calvary policies. Callers should not expect feedback on their call as any action taken regarding the call will usually be discrete and confidential.

4.9 LifeWork's Role

LifeWork will act solely as a conduit for recording and reporting on information received. LifeWork does not involve carrying out investigations or making decisions in relation to the information provided. LifeWork will determine if the call requires reporting to government agencies or emergency services such as calling police and fire brigade as is required by law and their professional standards.

4.10 Investigation

The Speak Out hotline managed by LifeWork will be a reporting mechanism to Calvary's key representative only. Calvary will then assume responsibility for prompt investigation of any reasonable reports of possible violations of law, professional and ethical standards, or Calvary policy.

Investigation processes will vary depending on the nature of the matter being investigated. All investigations will be conducted in a manner that is fair, objective and affords natural justice to all people involved. A matter will not be investigated by someone who is involved in the issue. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and if so, in what form it should take. The overriding principle will be to consider the interests of the individuals concerned, Calvary and the public.

Some concerns may be resolved by agreed action without the need for further investigation. If urgent action is required it will be taken before any investigation is conducted.

Once an investigation has commenced, updates will be provided to people who raise concerns and where an investigation shows that wrongdoing has occurred, Calvary is committed to changing processes and taking action in relation to employees who have behaved inappropriately. Where illegal conduct has occurred, this may involve reporting the matter to relevant authorities or if appropriate, the police. Where the employee has chosen to remain anonymous feedback may be provided through the LifeWork contact.

4.11 Governance

The Speak Out hotline is delivered in compliance with the laws and practices that protect the rights of callers. This includes the Australia Standard "Whistleblower Protection Programs for Entities", AS 8004-2003. The standard applies to the public and private sector, as well as not-for-profit entities.

4.12 Vexatious Behaviour

Our procedure provides for disciplinary action to be taken against anyone who deliberately makes a vexatious, false or dishonest report.

No action will be taken against an employee where the report was made in good faith and no wrongdoing was identified.

5. Related Calvary Documents

- All related Policies, Procedures, Forms or Work Instructions that are not being adhered to.
- Grievance Procedure
- Workplace Behaviour Policy

6. Definitions

- **Calvary** refers to the Little Company of Mary Health Care and all of its employing entities
- **Employees** for the purpose of this procedure refer to:
 - Every Calvary employee (permanent full time and part-time, casual or fixed term);

- Contractors/sub-contractors and any of their employees whilst engaged on work for Calvary and with access to Calvary systems and/or contact with patients/residents/clients;
- Visiting Medical Officers;
- Volunteers and unpaid employees;
- Students on placement;
- Contractors/sub-contractors and any of their employees whilst engaged on work for Calvary;
- Researchers;
- Consultants or consultants' employees whilst on Calvary work
- **Partners of Calvary** for the purpose of this procedure refers:
 - Partners and visitors (e.g. Medirest, Local Health District employees);
 - Agents who are acting on behalf of Calvary
- **Manager** means the person who is responsible for day-to-day management or supervision of the employee.
- **Calvary key representative** means Executive of local Calvary site.
- **The Whistleblower** - The Australian Standard AS8004-2003 "Whistleblower Protection Programs for Entities" defines a whistleblower as "A person being a director, manager, employee or contractor of an entity who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with reportable conduct and where the whistleblower wishes to avail themselves of protection against reprisal for having made the report. A whistleblower may or may not wish to remain anonymous."

7. References

- AS 8004-2003 Australian Standard "Whistle-blower Protection Programs for Entities"

8. Appendix

- Ethics and Compliance Hotline Form



Ethics and
Compliance Hotline Fc