

1. Preamble

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3. Objectives

The objectives of the Whistleblower Protection Policy and Guidelines are to:

encourage the reporting of actual or suspected wrongdoing that cannot appropriately be reported through normal reporting channels;

describe clearly the process for making a whistleblower disclosure and the types of matters that should be reported;

describe clearly the process for investigating a whistleblower disclosure;

outline how EREA manages whistleblower disclosures in a way that will support and protect the whistleblower, as well as ensure fairness for a person named in the disclosure.

give effect to the spirit of whistleblower legislation that prohibits regulated organisations from taking adverse action against any staff member, or a supplier of services or goods.

4. Roles & Responsibilities

There are a number of key roles supporting EREA's Whistleblower Protection program. Key roles and their main responsibilities are outlined below:

- i) Discloser

other serious acts such as refusing to carry out lawful and/or reasonable actions under a contract

other serious misconduct that may materially damage EREA's reputation, or may otherwise be detrimental to EREA and its member entities

any other act that would otherwise be considered, by a reasonable person, to be serious improper conduct, or an improper state of affairs, or circumstances.

Wrongdoing would also include a deliberate attempt to conceal any of the actions described above.

A person

EREA engages Your Call as our external eligible recipient of disclosures. One of the primary purposes of retaining Your Call is to allow whistleblowers to disclose their identity to Your Call only and to keep their identity confidential from EREA.

If a whistleblower provides their identity to Your Call it can assist in any subsequent investigation, and will also allow Your Call to follow up and seek any clarification or provide feedback.

If the whistleblower's identity is disclosed to Your Call, they will at the first opportunity discuss with the whistleblower the issues of anonymity and confidentiality and the degree of risk that their identity may become known during an investigation.

Information received from a whistleblower will be held in the strictest confidence and will only be disclosed to a person not connected with the investigation if:

the whistleblower has been consulted and consents in writing to the disclosure; or

Your Call is compelled by law to do so.

You Call will advise the whistleblower if matters change in a way that affects their ability to protect the whistleblower's identity and will give the whistleblower as much warning as reasonably possible if it appears likely that their identity will become known.

EREA is committed to providing a supportive environment for any person making a whistleblower disclosure. In particular, a whistleblower can expect that:

any request for anonymity is respected and if their identity is revealed it will, as far as possible, remain confidential and only be disclosed on an "as needed basis"

the details of their disclosure will remain confidential to the extent that is practical in the circumstances and will only be released on an "as needed basis" during the investigation phase, or as required by law

they will be protected from retaliation, harassment or victimisation

should retaliation occur, it will be treated as serious misconduct and the perpetrator of the retaliation will be subject to disciplinary action.

Where a whistleblower provides their identity to Your Call but not to EREA, it is the role of Your Call to ensure that they are supported throughout the investigation process.

Where a whistleblower provides their identity directly to EREA it is the role of EREA's Whistleblower Protection Officer who received the disclosure to ensure that they are supported throughout the investigation process.

Your Call and/or EREA's Whistleblower Protection Officer will also advise the whistleblower of professional support services, such as confidential professional counselling services, that may be available.

EREA is committed to ensuring the highest standards of ethical conduct across the organisation and is supportive in creating and maintaining a “speak-up culture”, where all staff members are encouraged to identify issues in the workplace and participate in resolving them. This includes “speaking up” through existing internal reporting procedures contained in our Internal Grievance, Complaints Handling, and Child Protection Policies.

EREA does not tolerate retaliation, harassment or victimisation being taken against whistleblowers for reporting actual or suspected wrongdoing, including when suspicions are not substantiated following a thorough investigation.

EREA takes steps to promote awareness to all staff of their responsibilities to treat their colleagues and stakeholders with respect, and never to engage in behaviour that is discriminatory or that characterises bullying or harassment. These responsibilities encompass acknowledging that reporting actual or suspected wrongdoing is integral to an ethical culture, and nobody who reports actual or suspected wrongdoing should experience retaliation, harassment or victimisation as a result.

If a whistleblower provides their identity when making a whistleblower disclosure, EREA’s Whistleblower Protection Officer will proactively monitor the workplace for signs of retaliation, harassment or victimisation and intervene when necessary. A whistleblower who experiences retaliation, harassment or victimisation should immediately report it to EREA’s Whistleblower Protection Officer. Any such conduct may be treated as serious misconduct and the perpetrator of the retaliation may be subject to disciplinary action.

