

Whistleblower and Public Interest Disclosure Policy

Whistleblower and Public Interest Disclosure Policy

Housing Choices Australia (**HCA**) expects the highest standards of conduct and ethical behaviour from its employees, contractors and volunteers. HCA takes reports of serious wrongdoing extremely seriously. We are committed to supporting and protecting eligible parties with the opportunity to report any actual or suspected wrongdoing or any other issue.

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1. Purpose

The purpose of this policy is to encourage and support the reporting of actual and suspected wrongdoing and misconduct. This Whistleblower and Public Interest Disclosure Policy is an important part of HCA's approach to risk management and corporate governance.

2. Application

HCA refers to all Housing Choices Australia entities, including the HCA Group and HCA Affiliates.

Whistleblowing regime and tax concerns

This policy applies to '**Eligible Whistleblowers**', who are, or have been:

- an officer of HCA;
- an employee of HCA;
- an individual who supplies services or goods to HCA (whether paid or unpaid);
- an employee of a person that supplies services or goods to HCA (whether paid or unpaid);
- an individual who is an associate of HCA;
- a relative anyone above (only a spouse or child for tax concerns);
- a dependant of an individual of anyone above, or of such an individual's spouse.

Public Interest Disclosure legislation

This policy also applies, where relevant State and Commonwealth Public Interest Disclosure legislation generally applies, to public officials including government employees, contractors, subcontractors and other individuals involved in the delivery of government-related services who may be eligible for protections under such legislation.

Individuals may be entitled to protections under both the relevant State and Commonwealth Public Interest Disclosure (**PID**) legislation (**PID Acts**) and the Commonwealth whistleblower protection regimes under the *Corporations Act 2001* and/or the *Taxation Administration Act 1953*. Any person who is aware of wrongdoing is encouraged to speak up.

3. Matters this policy applies to

3.1. Disclosable matters – Whistleblowing regime

'**Disclosable Matters**' are where the discloser has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances within HCA. Disclosable Matters may include, but are not limited to:

- dishonest, corrupt or illegal activities, including contravention of the *Corporations Act 2001* or the *Australian Securities and Investments Commission Act 2001* or any other Commonwealth law where the offence is punishable by imprisonment for a period of 12 months or more
- theft, fraud, money laundering or misappropriation
- serious or systemic misconduct (including negligence, default, breach of trust and breach of duty)
- conduct that represents a danger to the public or financial system
- a serious breach of HCA's policies and procedures, including the Code of Conduct

- offering or accepting a bribe
- seriously inappropriate use of HCA funds or resources
- serious misuse of information
- a criminal offence including assault, damage/sabotage, violence, drug/alcohol sale or use
- unsafe work practices with wilful disregard to the safety of others
- victimising (or threatening to victimise) someone for reporting Disclosable Matters
- recrimination against someone because they participated in an investigation or review
- any instruction to cover up or attempt to cover up Disclosable Matters.

3.2. Public Interest Disclosure legislation

PID Acts do not apply uniformly, and their applicability varies by jurisdiction. Generally, they relate to government contracts and may extend protections only to certain categories of individuals, depending on the role they perform and the nature of the disclosure. HCA provides services under state and federal government contracts, and these may be subject to relevant PID Acts. Should an individual wish to make a disclosure under a PID Act, they are encouraged to seek independent legal advice.

Because the applicability of each PID Act may vary depending on circumstances, roles, and jurisdictional requirements, this policy provides focus on whistleblower regimes in detail, with a summary only of primary PID legislation included in Appendix A. The procedural elements of making a disclosure apply to both Whistleblower and Public Interest Disclosure regimes. The difference is in who can be a discloser, the matters that can be disclosed, who can receive a disclosure and the protections available.

Where a disclosure may be eligible under both a PID Act and the Commonwealth whistleblower regimes, HCA will take reasonable steps to ensure it is managed in accordance with the correct legislative framework and that the discloser is not disadvantaged for raising their concerns in good faith.

3.3. Tax concerns

If you have concerns about tax avoidance behaviours or other tax issues, there is a separate Tax Whistleblower scheme. There must be reasonable grounds to suspect misconduct or an improper state of affairs or circumstances in relation to tax affairs of HCA or an associate of HCA and the discloser must consider that the information may assist the recipient to perform their duties under a taxation law. See section 5.1 for who is an **'Eligible Recipient'** for disclosure of tax concerns.

3.4. Reasonable grounds for suspicion

A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of the Disclosable Matters. Therefore, it is important that those who make a report under this policy do so honestly and with reasonable grounds for suspecting that the information is correct. Reasonable grounds for suspicion means that, based on the facts available, a reasonable person in a similar situation could also suspect wrongdoing. Suspicion is not proof, but it must be more than mere speculation. The suspicion does not need to be proven correct to qualify for legal protections (see section 7 for more information on legal protections).

Although the motivation for disclosure is not relevant to whether it is a Protected Disclosure, if a report is found to be deliberately false, an employee making the report may be subject to disciplinary action.

4. Matters not covered by this policy

Matters that are not Disclosable Matters are not covered by this policy and do not qualify for Whistleblower protections under the *Corporations Act 2001*. This policy does not apply to personal work-related grievances (other than where it involves detriment to a discloser, potential discloser, or person suspected or believed to be a discloser – see section 7.2).

Some examples of grievances that may be personal work-related grievances include:

- an interpersonal conflict
- a decision relating to the engagement, transfer or promotion of an employee
- a decision to discipline, suspend or terminate the engagement of an employee.

Personal work-related grievances may be reported in accordance with the [Employee Grievance Policy and Procedure](#).

This policy does not cover general complaints about HCA that are not Disclosable Matters. Refer to the [Complaints and Appeals Policy and Procedure](#), which applies to customers, including residents, community members, NDIS participants, housing applicants, neighbours of HCA residents and members of the broader community impacted by HCA 's services.

5. People who can receive a disclosure

5.1. Eligible Recipients

There are certain people who are authorised by law to receive a disclosure. These people are ‘**Eligible Recipients**’. To qualify for legal protections, the disclosure must be made to an Eligible Recipient.

Disclosers are encouraged to make a disclosure to an officer or senior manager of HCA so that wrongdoing may be addressed at the earliest opportunity. However, a discloser may choose any channel and need not report to HCA in the first instance.

Disclosable Matters – Whistleblower regime

For non-tax related disclosable matters, an Eligible Recipient is:

- The Chief Executive Officer
- The General Counsel and Company Secretary
- Any member of the Executive Leadership Team (details available on HCA’s website)
- A member of the Board of Directors (details available on HCA’s website)
- Director Risk & Compliance, Director People & Culture (who are authorised to receive disclosures)
- An auditor, or a member of an audit team conducting an audit of HCA
- The Australian Securities and Investment Commission (**ASIC**)
- The discloser’s lawyer (to obtain legal advice or representation).

Public Interest Disclosure legislation

- The CEO (principal officer)

- General Counsel and Company Secretary, Director Risk & Compliance, Director People & Culture (who are authorised, specified, responsible and/or prescribed to receive a disclosure for the purpose of Public Interest Disclosure Acts)
- The discloser's lawyer (to obtain legal advice or representation).

Tax concerns

Eligible Recipients for taxation matters are:

- Director Risk & Compliance, Director People & Culture (who are authorised to received disclosures)
- Auditors or audit team members
- HCA's registered tax agent or BAS agent
- The Tax Practitioners Board.

A Tax Whistleblower may disclose the matters to a medical practitioner or psychologist for the purpose of obtaining assistance in relation to the disclosure. The matter may be disclosed to a lawyer for legal advice or representation about the matter even if it does not qualify as an eligible tax disclosure.

5.2. Disclosure to journalists or parliamentarians

In certain circumstances, a disclosure may be made to a journalist or parliamentarian and still qualify for protections. Independent legal advice should be sought before making a public interest or emergency disclosure.

Whistleblower regime

A '**public interest disclosure**' (not to be confused with Public Interest Disclosure legislation for government service-related disclosures) or '**emergency disclosure**' may be made to a journalist or parliamentarian, but only after a Protected Disclosure has been made to ASIC. The circumstances where disclosure to journalists or parliamentarians is permitted is outlined in **Appendix B: Public Interest & Emergency Disclosure Criteria – Whistleblower regime**.

Public Interest Disclosure legislation

There are similar provisions for disclosures made under Public Interest Disclosure legislation, but with important differences. Consult relevant legislation prior to considering disclosures to journalists or parliamentarians under these laws.

Tax concerns

There is no provision to disclose tax concerns to a journalist or parliamentarian under the *Taxation Administration Act 1953*.

6. How to make a Protected Disclosure

A 'Protected Disclosure' is where:

- An 'Eligible Whistleblower' or 'Tax Whistleblower' (section 2)
- Reports a 'Disclosable Matter' or tax concern (section 3)
- To an 'Eligible Recipient' (section 5).

Each criterion above must be met for a disclosure to qualify for legal protections.

Refer to **Appendix A** for making a disclosure under PID Acts.

6.1. Before disclosure

Prospective disclosers may seek more information about the policy and relevant legislation by contacting:

- Their lawyer (at their own cost)
- Eligible Recipients
- HCA's Whistleblower Protection Officer (WPO).

The WPO is not an Eligible Recipient. The WPO's role is to provide support to disclosers. Prospective disclosers may make general enquiries with the WPO without providing information about the Disclosable Matter. To qualify for protections, a Disclosable Matter must be disclosed to an Eligible Recipient.

6.2. Making a disclosure

A Protected Disclosure can be made in writing, online, by telephone or in person (where the discloser has access to Eligible Recipients).

Where possible, disclosures should include:

- the name, job title and workplace address of the person/s that are involved in the alleged wrongdoing
- the nature of the wrongdoing or improper state of affairs or circumstances
- dates, times and places where the wrongdoing occurred or is likely to occur
- names of anyone who may corroborate details of the disclosure
- any other evidence that supports the disclosure such as email, documents, audio or video recordings.

6.3. Anonymous disclosures

Disclosers may report anonymously, and outside business hours, through most channels. Anonymous reports are still subject to the protections outlined in Section 7 below. It is important to understand that anonymous reporting can impact or limit the ability of HCA to fully investigate the matter. It is recommended that anonymous reports are made in a way that allows for a channel of communication between the discloser and HCA, so that HCA can request any follow up information and so that the discloser can be informed of any investigation outcome, where appropriate.

Communication can be maintained while remaining anonymous by using a pseudonym via an email the discloser sets up specifically for the disclosure, or via post using a post office box. A discloser may maintain anonymity during and after any investigation. To maintain their anonymity, a discloser may refuse to answer questions that could identify them.

6.4. Secure channels

Contact with Eligible Recipients can be made via:

HCA Whistleblower Reporting Channels	
Phone	1300 312 447
Email	whistleblowing@hcau.org.au
Post	General Counsel and Company Secretary [insert other job title if preferring to direct the disclosure to a particular individual] 3/350 Queen Street Melbourne 3000

Independent Whistleblowing Service	
Website	https://www.rsm.global/australia/WBreporting
Email	RSMHelpline@rsm.com.au
Post	National Head of Fraud & Forensic Services RSM Australia Level 21 55 Collins Street Melbourne Victoria 3000

You may also report to external parties as follows:

- [Report issue to ASIC | ASIC](#)
- [Tax whistleblowers | Australian Taxation Office](#)
- Tax Practitioners Board [Complaints](#)

7. Legal protections for disclosers

The legal protections detailed in the following sections (7.1 - 7.4) are available only in the circumstances of a **'Protected Disclosure'** (see section 6: How to make a Protected Disclosure). A person who contravenes any of these provisions may be found guilty of an offence and subject to civil penalties.

7.1. Identity protection

It is illegal to reveal the identity or information that is likely to lead to the identification of an Eligible Whistleblower who makes a qualifying disclosure except:

- with the Whistleblower's consent
- to a lawyer for legal advice or representation on the matter
- to ASIC, Australian Taxation Office (**ATO**) or Australian Federal Police (**AFP**), depending on the nature of the disclosure.

HCA will take all reasonable steps to reduce the risk that an Eligible Whistleblower is identified, including removing identifying details from the disclosure, using gender neutral terms, pseudonyms, and limiting the people involved in handling the matter to trained staff. Where the discloser is contactable, we will ask the discloser to identify aspects of their disclosure that might inadvertently identify them.

If a discloser is concerned about a breach of confidentiality, they may contact HCA's Whistleblower Protection Officer (see section 9) or lodge a complaint with a regulator such as ASIC or the ATO.

7.2. Protection from detrimental acts or omissions

It is against the law to cause, or threaten to cause, detriment to a discloser, or a person believed or suspected to be a discloser or prospective discloser (even if they are not). A threat does not have to actually cause fear to be illegal.

HCA will take all reasonable steps to ensure that the discloser is not subject to dismissal, workplace injury, alteration of work duties, workplace discrimination, harassment, intimidation, physical or psychological harm, property damage, reputational damage, business or financial damage or any other unfavourable treatment because they made a report. The Eligible Recipient will make an initial assessment of potential for detriment and options for protection. This will be done in consultation with the discloser where the discloser is contactable. The discloser will be offered support from HCA's Whistleblower Protection Officer and if relevant, HCA's Employee Assistance Program, Acacia Connection (www.acaciaconnection.com).

Detrimental conduct does not include administrative or management actions necessary for:

- the protection of the discloser, such as moving the discloser's place of work away from an area disclosed about
- the performance or safety of the workplace in accordance with HCA policies and legislative obligations.

Any administrative or management action warranted will be explained to the discloser and will be managed by a person not involved in responding to the disclosure.

Disclosers are encouraged to seek independent legal advice if they believe they have suffered detriment.

7.3. Compensation and remedies

If a discloser, or a person believed or suspected to be a discloser or prospective discloser (even if they are not) suffers loss, damage or injury as a result of detrimental conduct, they may claim compensation or other remedies (like reinstatement to a job or an apology) from HCA. The offender may be charged with a criminal offence and liable for civil penalty. Disclosers are encouraged to seek independent legal advice should they wish to seek compensation or remedies.

7.4. Civil, criminal and administrative liability protection

A person who makes a Protected Disclosure is not subject to civil, criminal or administrative liability (including disciplinary action) for making the disclosure, but may be for conduct that is revealed by the disclosure, or for providing false information.

8. Whistleblower Protection Officer

HCA acknowledges that speaking up can be difficult and we are committed to providing support to disclosers throughout the process. As part of that commitment, disclosers have access to HCA's Whistleblower Protection Officer (**WPO**). The WPO is responsible for ensuring protections under this policy are enforced and maintained. The WPO will only become involved in specific disclosures at the request of, or direct contact by, the discloser.

If a discloser has any questions or concerns regarding the protections that apply, the support that is provided, how a disclosure might be handled, or other parts of the policy, the Whistleblower Protection Officer (WPO) may be contacted at wpo@hcau.org.au. HCA has two WPOs:

- Director Supportive Services
- Director Placemaking and Partnerships

The WPO is not an Eligible Recipient (see section 5 for more information on how to make a disclosure).

9. Handling and investigating disclosures

9.1. Assessment

HCA will assess disclosures fairly, impartially and in a timely manner. Even if it is not a Protected Disclosure, HCA treats all disclosures confidentially.

The Eligible Recipient will consider whether there is sufficient detail, whether the Eligible Whistleblower is contactable if further information is required, and whether the matter falls within the scope of Disclosable Matters.

Advice and support may be required from specialist roles within HCA, such as legal counsel and human resources staff, or external legal or investigation resources. Disclosure of information about the matter will be limited to what is reasonably necessary to assess the matter and identify protection measures (see section 7.1 Identity Protection).

Not all disclosures will result in a formal, in-depth investigation.

The Eligible Recipient will also make an initial assessment of potential for detriment and options for protection. This will be done in consultation with the discloser where the discloser is contactable. The discloser will be offered support from HCA's Whistleblower Protection Officer and if relevant, HCA's Employee Assistance Program, Acacia Connection. Information on how to contact Acacia Connection can be found at www.acaciaconnection.com.

Subject to privacy, confidentiality and legal requirements, the discloser will be kept informed of:

- the relevant progress of the disclosure and any investigation
- estimated timeframes (which may vary according to the nature of the disclosure)
- the outcome of the disclosure and/or investigation.

9.2. Investigation

If investigation is deemed appropriate and viable, the Eligible Recipient will need to determine:

- the nature and scope of the investigation
- the person(s) within and/or outside the entity that should lead the investigation
- the nature of any technical, financial or legal advice that may be required to support the investigation
- the timeframe for the investigation.

The Eligible Recipient may refer the matter to a 'Whistleblower Investigation Officer' (**WIO**) who has requisite independence, skills and experience to investigate the disclosure. The WIO may be an employee of HCA or an independent third party. Depending on the nature of the disclosure, the matter may require referral to a law enforcement body. The identity of the Eligible Whistleblower will not be disclosed unless the investigating body is ASIC or AFP.

The WIO will investigate the matter in accordance with HCA's Whistleblower and Public Interest Disclosure Investigation Procedure. An investigation may involve collection of documentary evidence, conducting interviews and providing any alleged wrongdoers with the opportunity to respond to allegations. The WIO will regularly assess, and where possible consult with the discloser about, the potential for detriment to them.

9.3. Reporting

Where an investigation has taken place, a report will be prepared by the WIO. This may be used to support any disciplinary action and/or referral to law enforcement agencies. Disclosure of the report will be minimised to the extent necessary for investigation of the issues raised, and all reasonable steps will be taken to maintain confidentiality of the discloser's identity.

De-identified disclosure and/or investigation reports may be used for analysis to identify systemic issues, root causes and opportunities for improvement. Findings and de-identified general information about disclosures and/or investigations may be reported to the Audit Assurance and Risk Committee and Board of Directors for oversight of the Whistleblower program and integrity of the organisation.

The discloser will receive information at the closure of the matter subject to privacy, confidentiality and legal requirements. It may not be possible to provide the final report to the discloser.

9.4. Review

If a discloser is not satisfied with the outcome of an assessment or investigation, they may contact the Whistleblower Protection Officer (see section 9) or an Eligible Recipient not involved in the assessment or investigation to review the matter. If an assessment or investigation is found to have been conducted properly, and new information is either not available or would not change the findings of an assessment or investigation, HCA is not obliged to reopen the matter. If the discloser is not satisfied with the review, they may lodge a complaint with a regulator such as ASIC or the ATO.

9.5. Ensuring fair treatment of individuals mentioned in a disclosure

HCA responsibilities

HCA is committed to undertaking timely enquiries and upholding procedural fairness. Procedural fairness means acting fairly in administrative decision making, including investigations under this Policy. It requires giving a person who may be adversely affected by a disclosure or investigation procedural fairness, including:

- a person involved in decision-making relating to a disclosure will be free from bias that might influence those decisions; and
- before a decision is made, a person against whom allegations are made, will be given a reasonable opportunity to respond to the allegations.

Discloser and participant responsibilities

To ensure fair treatment of individuals involved in a disclosure (including the discloser themselves), the discloser and all participants (including the respondent) are required to keep the matter confidential (subject to any legal requirements).

10. Roles and Responsibilities

Role	Description	Responsibilities
Audit Assurance and Risk Committee	Oversight of policy implementation	<ul style="list-style-type: none"> • Receive regular reports of the general nature of disclosures, findings, reviews and opportunities for improvement arising
Board of Directors	Accountability for policy and implementation	<ul style="list-style-type: none"> • Satisfy themselves that there is an effective Whistleblower Policy and program in place • Ensure that the broader trends, themes and/or emerging risks highlighted by disclosures are addressed and mitigated • Receive immediate notification of disclosures that may have a material impact on HCA
Discloser	A person who provides information about suspected	<ul style="list-style-type: none"> • Make a report via whistleblowing channels to an Eligible Recipient

Role	Description	Responsibilities
	misconduct or improper affairs or circumstances.	<ul style="list-style-type: none"> Keep the disclosure confidential
Eligible Recipient	A person to whom a Protected Disclosure can be made.	<ul style="list-style-type: none"> Receive disclosures Maintain confidentiality of the disclosure Protect the identity of an Eligible Whistleblower Assess potential for detriment to an Eligible Whistleblower Take all reasonable steps to protect an Eligible Whistleblower from detriment
Eligible Whistleblower	<ul style="list-style-type: none"> an officer of HCA; an employee of HCA; an individual who supplies services or goods to HCA (whether paid or unpaid); an employee of a person that supplies services or goods to HCA (whether paid or unpaid); an individual who is an associate of HCA; a relative anyone above (only a spouse or child for tax concerns); a dependant of an individual of anyone above, or of such an individual's spouse. 	<ul style="list-style-type: none"> Make a report via whistleblowing channels to an Eligible Recipient Keep the disclosure confidential
General Counsel and Company Secretary	Executive accountability and operational oversight of the Whistleblower program	<ul style="list-style-type: none"> Receives notification of the substance of disclosures, but not the identity of the disclosers from Eligible Recipients Approves external investigation and advisory services Receives regular reports on the status of a disclosure Approves final investigation reports (CEO or Board Chair to fulfill this role if the General Counsel and Company Secretary is unavailable or conflicted)
Independent Whistleblowing Service	External reporting channel	<ul style="list-style-type: none"> Triage reports made to the independent whistleblowing service Notify the General Counsel and Company Secretary of the substance of a disclosure, but not the identity of the discloser Assess potential for detriment to an Eligible Whistleblower Conduct impartial investigations in accordance with HCA's Whistleblower and Public Interest Disclosure Investigation Procedure Maintain confidentiality and procedural fairness

Role	Description	Responsibilities
		<ul style="list-style-type: none"> • Monitor the wellbeing of an Eligible Whistleblower • Protect the identity of an Eligible Whistleblower • Respond to Eligible Whistleblower concerns about the process
Tax Whistleblower	A person making a disclosure about tax misconduct under the <i>Taxation Administration Act 1953</i>	<ul style="list-style-type: none"> • Make a report via whistleblowing channels to an Eligible Recipient • Keep the disclosure confidential
Whistleblower Investigation Officer	Investigates matters referred by Eligible Recipients	<ul style="list-style-type: none"> • Conduct impartial investigations in accordance with HCA's Whistleblower and Public Interest Disclosure Investigation Procedure • Maintain confidentiality and procedural fairness • Protect the identity of an Eligible Whistleblower
Whistleblower Protection Officer	Supports Eligible Whistleblowers	<ul style="list-style-type: none"> • Assess potential for detriment to an Eligible Whistleblower • Take all reasonable steps to protect an Eligible Whistleblower from detriment • Maintain confidentiality • Monitor the wellbeing of an Eligible Whistleblower • Protect the identity of an Eligible Whistleblower • Respond to Eligible Whistleblower concerns about the process

11. Access to this policy

HCA ensures this policy is easily accessible through the following means:

- Publishing it on HCA's website and intranet
- Including it in mandatory onboarding reading for new employees.

12. Implementation

This policy is implemented through our:

- Whistleblower and Public Interest Disclosure Investigation Procedure

13. References

This policy is created with reference to the following legislation and other external documents:

- *Corporations Act 2001*
- *Taxation Administration Act 1953*
- *Public Interest Disclosure Act 2013* (Commonwealth)
- *Public Interest Disclosures Act 2022* (NSW)
- *Public Interest Disclosure Act 2012* (Victoria)
- *Public Interest Disclosure Act 2018* (South Australia)

14. Document details

Title	Whistleblower and Public Interest Disclosure Policy
Version	v6.0
Approver	Board of Directors
Owner	General Counsel and Company Secretary
Approval date	24.02.2026
Review period	2 years

Appendix A: Public Interest Disclosure Regimes

Jurisdiction and Act	Who can disclose (only HCA relevant categories listed)	What you can disclose	Who to disclose to	Protections
Commonwealth <i>Public Interest Disclosure Act 2013</i> (PID Act)	<p>HCA officers and employees may become a 'public official' for the purpose of the Act in relation to work they do as service providers under a Commonwealth contract (s30 PID Act).</p>	<p>The information tends to show, or the public official reasonably believes tends to show, disclosable conduct.</p> <p>Disclosable conduct (s29 PID Act)</p> <p>Conduct engaged in by an agency, public official or contracted service provider AND involves:</p> <ul style="list-style-type: none"> illegal conduct including conduct which contravenes Commonwealth and State legislation perverting the course of justice corruption maladministration abuse of public trust deception relating to scientific research wastage of public money or public property unreasonable danger to health or safety or to the environment other conduct described in the PID Act and associated PID Rules. 	<ul style="list-style-type: none"> An authorised officer of the agency that the disclosable conduct relates to (s34 Item 1(a) PID Act) An 'authorised officer' within the disclosing public official's current or previous agency (s34 Item 1(b) PID Act) (see s5.1 this Policy) The Ombudsman (s34 Item 1(c) PID Act). An external disclosure can only be made in certain circumstances after an internal disclosure is made (s26 Item 2(b) PID Act) other than where an emergency disclosure is required (s26 Item 3). National Anti-Corruption Commission (s26(1A) PID Act) which is authorised to receive relevant disclosures 	<p>Protection from:</p> <ul style="list-style-type: none"> Reprisals Exposure of their identity without consent (subject to some exceptions including if you act inconsistently with the relevant protection requirements) Civil, criminal or administrative liability (s10 PID Act) <p>The PID Act will not protect you:</p> <ul style="list-style-type: none"> if you knowingly disclose false or misleading information (s11 PID Act), or from the consequences of your own wrongdoing which may be investigated as a result of the PID (s12 PID Act).

Jurisdiction and Act	Who can disclose (only HCA relevant categories listed)	What you can disclose	Who to disclose to	Protections
<p>Victoria</p> <p><i>Public Interest Disclosure Act 2012 (PID Act)</i></p>	<ul style="list-style-type: none"> A person that is performing a public function on behalf of the State or a public officer or public body (whether under contract or otherwise). A person employed in any capacity or holding any office in a public entity (s6 Broad-based Anti-corruption Commission Act 2011) A public entity includes a body (and its subsidiaries) that has a public function to exercise on behalf of the State (s5 <i>Public Administration Act 2004</i>) 	<p>The information tends to show, or the public official reasonably believes tends to show, a person, public officer or public body has engaged, is engaging or proposed to engage in improper conduct, or has taken, is taking or proposes to take detrimental action against a person in contravention of section 4.</p> <p>Improper conduct is defined in section 4 and includes corrupt conduct, criminal offences, serious professional misconduct, dishonest performance of public functions, breach of public trust, misuse of relevant information and mismanagement of public resources.</p>	<p>If the disclosure relates to HCA:</p> <ul style="list-style-type: none"> In general, to a public officer or entity 'prescribed' for this purpose (s15(1) PID Act) (see s5.1 this Policy) IBAC (s13(2(a) PID Act) The Ombudsman (s13(2(b) PID Act) Integrity Oversight Victoria (s13(2(c) PID Act). <p>If the disclosure relates to another public sector entity (not HCA) see s14 of the <i>Public Interest Disclosure Act 2012</i></p>	<p>Protection from:</p> <ul style="list-style-type: none"> Civil or criminal liability in certain circumstances (s39) Various breaches of confidentiality (s40 PID Act) Proceedings for defamatory action (s41 PID Act) Detrimental action from another person against you (s43 PID Act) The PID Act will <i>not</i> protect you from liability for your own conduct (s42 PID Act).
<p>South Australia</p> <p><i>Public Interest Disclosure Act 2018 (PID Act)</i></p>	<p>Public officer being a person performing contract work for a public authority or the Crown (IBAC Act Schedule 1) making a disclosure of public administration information in respect of corruption, misconduct or maladministration in public administration (s5(4) PID Act)</p> <p>Any person can make an appropriate disclosure of environmental or health information (s5(3) PID Act))</p>	<p>An 'appropriate disclosure' means</p> <ul style="list-style-type: none"> Any person discloses information that raises a potential issue of a substantial risk to the environment or to the health and safety of the public generally or a significant section of the public (s4 (definitions) and (s5(3) PID Act) A public officer discloses information that raises a potential issue of corruption, misconduct or maladministration in public administration (s5(4) PID Act) 	<ul style="list-style-type: none"> Person who is responsible for the management or supervision of the public officer (s 5(5)(a)(i) and (ii) PID Act) Relevant 'responsible officer' (s12(1) and s5(5)(a)(i) and (ii) PID Act) (see s5.1 this Policy) Journalist or member of Parliament if disclosures made internally first (s6 PID Act) 	<p>Protections:</p> <ul style="list-style-type: none"> Any liability (s5(1) PID Act) Exposure of identity (s8 PID Act) Victimisation (s9 PID Act) Being prevented or hindered from making a disclosure (s11 PID Act)

Jurisdiction and Act	Who can disclose (only HCA relevant categories listed)	What you can disclose	Who to disclose to	Protections
<p>New South Wales</p> <p><i>Public Interest Disclosure Act 2022</i> (PID Act)</p>	<p>A 'public official' includes: An employee, partner or officer of an entity who is under a contract, subcontract or other arrangement to provide services on behalf of an agency or exercise functions of an agency in whole or in part (s 14 PID Act)</p>	<ul style="list-style-type: none"> Shows or tends to show serious wrongdoing which includes corrupt conduct, serious maladministration, privacy contravention and a serious and substantial waste of public money (s13 and 26 PID Act) 	<p>A 'disclosure officer' includes (s18 PID Act):</p> <ul style="list-style-type: none"> The CEO (the head of the agency s 18(1)(a) PID Act) The most senior ongoing employee at a permanent work location (s18(1)(b) PID Act) The Board (s18(1)(c) PID Act) People specified to receive disclosures (s18(1)(d) PID Act) (see s5.1 this Policy) 	<p>Protections:</p> <ul style="list-style-type: none"> Detrimental action (s32 PID Act) Civil and criminal liability and disciplinary action (s40 PID Act) A person is not protected from liability for own past conduct (s41 PID Act)

Appendix B: Public Interest & Emergency Disclosure Criteria – Whistleblower regime

Public Interest Disclosure (Whistleblower regime)	
Criteria	The law requires
Previous report	You must have previously made a 'Protected Disclosure' to ASIC.
90 days	At least 90 days have passed since you reported your concerns to ASIC, and you do not have reasonable grounds to believe that action to address your concerns is being or has been taken.
Public interest	You have reasonable grounds to believe that reporting your concerns to a journalist or parliamentarian would be in the public interest.
Written notice to ASIC	After 90 days from when you reported to ASIC, you give ASIC a written notice that includes sufficient information to identify your earlier report and states your intention to make a public interest disclosure. This could be by contacting the ASIC officer who considered your concerns and quoting the reference number of your case.
Journalist or parliamentarian	You report your concerns about misconduct or an improper state of affairs or circumstances or a breach of the law to a journalist or a parliamentarian. The extent of the information disclosed is no greater than is necessary to inform the recipient about your concerns.

Emergency Disclosure	
Criteria	The law requires
Previous report	You must have previously made a 'Protected Disclosure' to ASIC.
Emergency	You have reasonable grounds to believe that the information in your report concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment.
Written notice to ASIC	You give ASIC a written notice that includes sufficient information to identify your earlier report and states your intention to make an emergency disclosure. Please quote the reference number of your previous report to ASIC.
Journalist or parliamentarian	You report your concerns about the substantial or imminent danger to a journalist or parliamentarian. The extent of the information disclosed is no greater than is necessary to inform the recipient about the substantial and imminent danger.



English:

If you need an interpreter, please call TIS National on 131 450 and ask them to call **Housing Choices Australia** on **1300 312 447**. Our business hours are **9am to 5pm, Monday to Friday**.

You can also visit the TIS National website for translated information about the service TIS National provides. Visit: www.tisnational.gov.au

Arabic:

إذا كنت بحاجة إلى مترجم، يرجى الاتصال بـ TIS الوطنية على الرقم 131 450 وأطلب منهم الاتصال بـ **Housing Choices Australia** على هاتف رقم **1300 312 447**. ساعات العمل الخاصة بنا **9am to 5pm, Monday to Friday**.

يمكنك أيضا زيارة موقع TIS الوطنية للحصول على معلومات حول الخدمات التي تقدمها TIS الوطنية. قم بزيارة: www.tisnational.gov.au

Farsi (alt Persian):

اگر به مترجم نیاز دارید، لطفاً با شماره تلفن تیس نشنال 131 450 تماس بگیرید و از آنها بخواهید با **Housing Choices Australia** به شماره **1300 312 447** تماس بگیرید. ساعت کاری ما **9am to 5pm, Monday to Friday** است.

www.tisnational.gov.au شما همچنین می توانید به وب سایت تیس نشنال برای اطلاعات در مورد خدماتی که تیس نشنال فراهم می کند مراجعه کنید. به

Vietnamese:

Nếu quý vị cần thông dịch viên, xin hãy gọi cho Dịch vụ Thông Phiên dịch Quốc gia (TIS Quốc gia) theo số 131 450 và yêu cầu họ gọi cho **Housing Choices Australia** theo số **1300 312 447**. Giờ làm việc của chúng tôi là **9am to 5pm, Monday to Friday**. Quý vị cũng có thể vào thăm trang mạng của TIS Quốc gia để có thông tin về các dịch vụ mà TIS Quốc gia cung cấp. Hãy vào thăm www.tisnational.gov.au

Somali:

Haddii aad u baahan tahay turjumaan, fadlan ka wac TIS National taleefanka 131 450 waxaad ka codsataa inay kuu wacaan **Housing Choices Australia** iyo **1300 312 447**. Saacadaha Shaqadu waa **9am to 5pm, Monday to Friday**. Waxaad kaloo booqan kartaa website-ka TIS National ee macluumaadka turjuman oo ku saabsan adeegga TIS National ay bixiso. Ka eeg: www.tisnational.gov.au

Simplified Chinese:

如果您需要口译员，请拨打TIS National的电话131 450，请他们打电话给**Housing Choices Australia**，电话号码：**1300 312 447**。我们的营业时间是**9am to 5pm, Monday to Friday**。

你也可以访问TIS National的网站，了解TIS National提供的服务。网址：www.tisnational.gov.au

Traditional Chinese:

若你需要口譯員，請撥打TIS National電話131 450並請他們轉接 **Housing Choices Australia** 的電話 **1300 312 447**。我們的工作時間是**9am to 5pm, Monday to Friday**。

你也可以瀏覽TIS National網站瞭解TIS National的服務資訊，網址：www.tisnational.gov.au

Spanish:

Si necesita un intérprete, por favor llame a TIS National en el 131 450 y pida que lo comuniquen con **Housing Choices Australia** en el **1300 312 447**. Nuestro horario de oficina es **9am to 5pm, Monday to Friday**.

También puede visitar el sitio web de TIS National para obtener información acerca de los servicios que provee TIS National. Visite www.tisnational.gov.au

Italian:

Se hai bisogno di un interprete, telefona a TIS National al numero 131 450 e chiedi di chiamare **Housing Choices Australia** al **1300 312 447**. I nostri orari d'ufficio sono **9am to 5pm, Monday to Friday**.

Puoi visitare anche il sito web TIS National per informazioni tradotte sul servizio che TIS National fornisce. Visita il sito: www.tisnational.gov.au

For other languages, access to an interpreter is available by contacting Housing Choices Australia on **1300 312 447**.