Aspect Policy

Whistleblower and complaint management policy

This Whistleblower and Complaint Management Policy outlines Aspect's commitment to high standards of service provision, accountable conduct and the promotion and support of a culture of honest and ethical behaviour, corporate compliance and good governance. It establishes principles for receiving, investigating and resolving complaints, and protections for whistleblowers.

Implementation of this Policy supports Aspect to manage complaints and disclosures fairly, confidentially and consistently, in line with Aspect's values, purpose and vision. This Policy supports Aspect to comply with applicable Australian laws, including the whistleblower protections under the Corporations Act 2001 (Cth).

This Policy applies to:

- Board Members
- All staff, volunteers and contractors
- All activities, programmes, locations and business units across Aspect.

This Policy covers:

- Complaints about the Organisation's activities, services, decisions or conduct
- Reports of misconduct, fraud, corruption or unlawful behaviour
- Protected whistleblower disclosures

This Policy is generally not intended for:

- Routine employee grievances
- Performance management issues
- Interpersonal disputes (unless involving serious misconduct)
- Customer service feedback.

Such matters should be managed under Aspect's People Policy and Aspect Ways of Working Policy and related documents.

Aspect is committed to:

- encouraging concerns to be raised without fear of retaliation;
- treating all complainants and whistleblowers with respect;
- maintaining confidentiality wherever possible;
- investigating concerns objectively and impartially;
- taking appropriate corrective action when required; and,
- procedural fairness for all parties involved.

Aspect recognises that maintaining a culture where complaints and disclosures are dealt with fairly and without fear of negative consequences is integral to maintaining trust from our participants, the community and broader stakeholders. Aspect values what can be learnt from complaints and disclosures to support Aspect to deliver quality services in pursuit of its purpose, vision and strategy.

Dealing with complaints and disclosures

Aspect is committed to managing complaints and disclosures as promptly and fairly as possible, in line with its Whistleblower and Complaint Management Procedure. Aspect will treat complainants and whistleblowers with due respect and ensure that complainants and whistleblowers are aware of their rights throughout the process. Aspect will deal with complaints and disclosures without bias.

Aspect has a range of controls in place to support this commitment, including:

- the Aspect Ways of Working Policy;
- the Aspect Code of Conduct;
- reporting to the Board and Executive;
- the Aspect Service Charter;
- monitoring stakeholder feedback;
- the Risk Management Framework;
- the Compliance Management Framework; and,
- the Incidents and Complaints Management System.

Protection of complainants, whistleblowers and those involved in investigations

Aspect is committed to protecting whistleblowers and complainants and prohibits retaliation against any person who makes a report or complaint in good faith, assists in an investigation, and/or provides information relating to suspected wrongdoing.

Retaliation, such as threats, exclusion, discrimination or unfair treatment, constitutes serious misconduct and may result in disciplinary action, including termination of employment or engagement.

Aspect has a range of controls in place to support this commitment, including:

- the Whistleblower and Complaint Management Procedure;
- the Aspect People Policy;
- the Aspect Code of Conduct;
- reporting to the Board and Executive;
- Work Health and Safety Management; and,
- the Risk Management Framework.

Aspect's Compliance and Privacy Officer is available to provide support to whistleblowers or complainants as required at any stage of the Whistleblower or Complaint reporting and/or investigation process.

Confidentiality

Aspect is committed to maintaining confidentiality regarding complaints and disclosures to the greatest extent possible. Information will only be disclosed: to investigate the matter;

where legally required; or, to obtain professional advice. Records will be stored securely and access will be restricted to authorised staff.

Aspect has a range of controls in place to support this commitment, including:

- the Whistleblower and Complaint Management Procedure;
- the Privacy and Data Protection Policy; and
- Data Governance Approach.

Procedural fairness

Aspect is committed to the fair treatment of all of those involved in any complaint or disclosure, including complainants, whistleblowers and those subject to allegations. This includes having processes in place such that those subject to allegations are informed of the allegations where appropriate, have a fair opportunity to respond, and are treated impartially. No conclusion will be made without consideration of all relevant evidence.

Aspect has a range of controls in place to support this commitment, including:

- the Whistleblower and Complaint Management Procedure;
- the Aspect People Policy;
- the Aspect Code of Conduct;
- the Incident and Complaints Management System; and,
- the Privacy and Data Protection Policy.

Breach and consequences

Non-compliance with this Policy could result in Aspect breaching legislation or regulations, including the Corporations Act 2001 (Cth), and could result in financial penalties, reputational risk and/or other impacts on Aspect's operations which may impact delivery of Aspect services.

Deliberate non-compliance by staff may result in disciplinary action and will be managed in accordance Aspect's People Policy.

Definitions

Term	Definition
Complaint	A complaint is an expression of dissatisfaction and will typically be in relation to: services provided by Aspect; behaviour of staff, volunteers, contractors or Directors; organisational decisions or actions; breaches of legislation, regulations or Aspect's policies and related documents.
Complainant	A person or organisation that makes a complaint.
Whistleblower	A person who, in good faith, reports actual or suspected misconduct, illegal conduct, unethical behaviour, corruption, fraud, misuse of resources, breaches of organisational policies, or other wrongdoing.
Whistleblower disclosure	A whistleblower disclosure is typically information regarding suspected: fraud; corruption; theft; financial or other

Term	Definition
	misconduct; breaches of law; misuse of organisational resources; or conduct that poses a risk to public safety or Aspect's reputation.
Procedural fairness	Procedural Fairness refers to the requirement that investigations into whistleblower disclosures and complaints and are conducted impartially, objectively, and without bias towards those involved, including the complainant, whistleblower, and those subject to the allegation or involved.