

# Whistleblower Policy

The purpose of this policy is to:

- encourage disclosures of wrongdoing;
- help deter wrongdoing, in line with SRS's risk management and governance framework;
- ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- ensure disclosures are dealt with appropriately and on a timely basis;
- provide transparency around SRS's framework for receiving, handling and investigating disclosures;
- support SRS's values and code of conduct;
- support SRS's long-term sustainability and reputation; and
- meet SRS's legal and regulatory obligations.

SRS recognises this policy is an important tool for helping SRS identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing. The Board of SRS encourages those who are aware of wrongdoing to speak up in accordance with this policy.

## Your rights. Your voice.

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Seniors Rights Service. ABN 98 052 960 862. ACN 626 676 533.

## Definitions

<b>Anonymity</b>	<p>Anonymity is when one's identity is unknown. In the case of an anonymous Whistleblower, their identity is not known by anyone, including those who receive and investigate the report.</p>
<b>Confidentiality</b>	<p>Confidentiality is when one's identity is protected to prevent harm. In the case of a Whistleblower, their identity may be known to those receiving and investigating the report, but is protected from the broader organisation and public.</p>
<b>Disclosable Matters</b>	<p>A disclosable matter is:</p> <ul style="list-style-type: none"> <li>• a disclosure of information relating to a disclosable matter directly to an Eligible Recipient or to ASIC, ATO or another Commonwealth body prescribed by regulation. Please note the ACNC is not a Commonwealth body prescribed by regulation;</li> <li>• a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the <i>Corporations Act 2001</i> (Cth); or</li> <li>• an emergency disclosure or public interest disclosure.</li> </ul> <p>Disclosable matters involve information about the discloser has reasonable grounds to suspect concerns of misconduct, or an improper state of affairs or circumstances, in relation to SRS. This includes, without limitation:</p> <ul style="list-style-type: none"> <li>• fraud, negligence default, breach of trust and breach of duty;</li> <li>• conduct that constitutes an offence against, or a contravention of, a provision of the <i>Corporations Act 2001</i> (Cth);</li> <li>• conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;</li> <li>• conduct that represents a danger to the public or the financial system.</li> </ul> <p>Examples of disclosable matters that relate specifically to SRS's business operations and practices include:</p> <ul style="list-style-type: none"> <li>• illegal conduct such as theft and criminal damage against property;</li> <li>• fraud, money laundering or misappropriation of funds;</li> <li>• offering or accepting a bribe;</li> <li>• financial irregularities;</li> <li>• failure to comply with, or breach of legal or regulatory requirements;</li> <li>and</li> <li>• engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.</li> </ul> <p>Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates a significant risk to public safety, even if it does not involve a breach of a particular law, is also a disclosable matter.</p> <p>A discloser can still qualify for protection even if their disclosure turns out to be incorrect.</p>

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Disclosures that are not able disclosable matters do not qualify for protection under the *Corporations Act 2001* (Cth). Such disclosures may be protected under other legislation such as the *Fair Work Act 2009* (Cth).

Disclosures that relate solely to Personal Work-Related Grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the *Corporations Act 2001* (Cth).

### Personal Work-Related Grievances

Personal work-related grievances are those that relate to the discloser's current or former employment and have, or tend to have implications for the discloser personally but to not:

- have any other significant implications for SRS; or
- relate to any conduct or alleged conduct about a disclosable matter.

Examples of a personal work-related grievance include:

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of workplace laws;
- a decision about the engagement, transfer or promotion of the discloser;
- a decision about the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser or otherwise to discipline the discloser.

There may be instances when a disclosure about, or including a personal work-related grievance still qualifies for protection. This includes if:

- the grievance includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- SRS has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- the discloser suffers from or is threatened with detriment for making a disclosure; or
- the discloser seeks legal advice or representation about the operation of the whistleblower protections under the *Corporations Act 2001* (Cth).

For information about how to internally raise a workplace grievance, please refer to the grievance policy.

SRS encourages employees to seek legal advice about their rights and protections under employment or contract law and to resolve their personal work-related grievance.

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## 1. Who does this policy apply to?

This policy applies to eligible disclosers. An eligible discloser is if you are an individual who is, or has been, any of the following in relation to SRS:

- an officer or employee (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, manager and directors);
- a supplier of services or goods to SRS (whether paid or unpaid), including their employees (e.g. current and former contractors consultants, service providers, business partners and volunteers);
- an associate of SRS;
- a relative, dependent or spouse of an individual in any of the above categories.

As an eligible discloser, you qualify for protection as a whistleblower under the *Corporations Act 2001* (Cth) if you have made:

- a disclosure of information relating to a disclosable matter directly to an eligible recipient or to ASIC, APRA or another Commonwealth body prescribed by regulation. Please note the ACNC is not a Commonwealth body prescribed by regulation;
- a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the *Corporations Act 2001* (Cth); or
- an emergency disclosure or public interest disclosure.

## 2. What matters does this policy cover?

This policy applies to 'disclosable matters'. Disclosable matters involve information that the discloser has reasonable grounds to suspect concerns of misconduct, or an improper state of affairs or circumstances, in relation to SRS. This includes, without limitation:

- misconduct including fraud, negligence default, breach of trust and breach of duty;
- conduct that constitutes an offence against, or contravention of, a provision of the *Corporations Act 2001* (Cth);
- conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- conduct that represents a danger to the public system.

Examples of disclosable matters that relate specifically to SRS's business operations and practices include:

- illegal conduct such as theft and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of legal or regulatory requirements; and

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- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates a significant risk to public safety, even if it does not involve a breach of a particular law, is also a disclosable matter. A discloser can still qualify for protection even if their disclosure turns out to be incorrect.

### 3. Does the policy cover personal work-related grievances?

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the *Corporations Act 2001* (Cth).

Personal work-related grievances are those that relate to the discloser's current or former employment and have, or tend to have implications for the discloser personally but to not:

- have any other significant implications for SRS; or
- relate to any conduct, or alleged conduct about a disclosable matter.

Examples of a personal work-related grievance include:

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- a decision that does not involve a breach of workplace laws;
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- a decision to suspend or terminate the engagement of the discloser or otherwise to discipline the discloser.

There may be instances when a disclosure about, or including a personal work-related grievance still qualifies for protection. This includes if:

- the grievance includes information about misconduct, or information about is conduct includes or is accompanied by a personal work-related grievance (mixed report);
- SRS has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- the discloser suffers from or is threatened with detriment for making a disclosure; or
- the discloser seeks legal advice or representation about the operation of the whistleblower protections under the *Corporations Act 2001* (Cth).

For information about how to internally raise a workplace grievance, please speak to your manager and/or CEO and refer to the SRS grievance policy.

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SRS encourages employees to seek legal advice about their rights and protections under employment or contract law and to resolve their personal work-related grievance.

SRS discourages deliberate false reporting (that is, a report that the discloser knows to be untrue). However, the Board does not want to unintentionally deter staff from making disclosures (e.g. disclosers who have some information leading to a suspicion, but not all the details)

#### 4. Who can receive a disclosure?

The people that can receive a disclosure that qualifies for protection include:

- eligible recipients which includes:
  - an officer (a director or company secretary) or senior manager of SRS;
  - external auditor
  - SRS's whistleblower protection officer;
- legal practitioners;
- regulatory bodies and other external parties; and
- journalists and members of Commonwealth, state or territory parliaments (parliamentarians) under certain circumstances.

It is important for a discloser to understand the criteria for making a public interest or emergency disclosure. Disclosure must have been previously made to ASIC or a prescribed body and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. SRS strongly recommends that a discloser contact an independent legal advisor before making a public interest disclosure or an emergency disclosure.

SRS would like to identify and address wrongdoing as early as possible and so encourages all disclosers to make a disclosure to SRS in the first instance. SRS's commitment to addressing wrongdoing is evidenced in its appointment of a whistleblower protection officer. The whistleblower protection officer is the first point of contact for a discloser. A discloser can contact the whistleblower protection officer to obtain additional information before making a disclosure. SRS's approach is intended to help build trust and confidence in this policy and related processes and procedures.

SRS acknowledges that a discloser can make a disclosure directly to regulatory bodies, or other external parties, about a disclosable matter and qualify for protection under the *Corporations Act 2001* (Cth) without making a prior disclosure to SRS.

#### 5. How can a disclosure be made?

A disclosure can be made by:

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- contacting the SRS whistleblower protection officer through post, email or phone on Level 4, 418A Elizabeth Street, Surry Hills, NSW 2010, [wpo@seniorsrightsservice.org.au](mailto:wpo@seniorsrightsservice.org.au), 1800 424 079; or
- contacting the SRS auditor through post, email or phone on [info@mhw.net.au](mailto:info@mhw.net.au) and 02 9387 8988.

These options allow for disclosures to be made anonymously and/or confidentially, securely and within and outside of business hours.

Disclosures can be made anonymously and still be protected under the *Corporations Act 2001* (Cth). A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations. A discloser who wishes to remain anonymous should maintain ongoing two-way communication with the SRS, so SRS can ask follow-up questions or provide feedback.

SRS's measures and/or mechanisms for protecting anonymity include:

- communication with disclosers will be through anonymized email addresses; and
- a discloser may adopt a pseudonym for the purpose of their disclosure— this may be appropriate in circumstances where the discloser's identity is known to their supervisor, the whistleblower protection officer or equivalent but the discloser prefers not to disclose their identity to others.

## 6. What are the legal protections for disclosers?

The protections for disclosers are:

- Identity protection (confidentiality);  
It is illegal for a person to identify a discloser, or disclose information that is likely to lead to the identification of a discloser, unless it falls within the legal exceptions. These being if a person discloses the identity of the discloser to ASIC or a member of the Australian Federal police, legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the *Corporations Act 2001* (Cth), to a person or body prescribed by regulations or with the consent of the discloser. A discloser can lodge a complaint with SRS about a breach of confidentiality by contacting the President of SRS at [president@seniorsrightsservice.org.au](mailto:president@seniorsrightsservice.org.au). A discloser may lodge a complaint with a regulator such as ASIC or the ATO for investigation.
- Protection from detrimental acts or omissions;  
Detrimental acts or omissions include the following: (a) dismissal of an employee; (b) injury of an employee in his or her employment; (c) alteration of an employee's

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position or duties to his or her disadvantage; (d) discrimination between an employee and other employees of the same employer; (e) harassment or intimidation of a person; (f) harm or injury to a person, including psychological harm; (g) damage to a person's property; (h) damage to a person's reputation; (i) damage to a person's business or financial position; or (j) any other damage to a person.

Examples of actions that are not detrimental conduct include: administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and managing a discloser's unsatisfactory work performance, if the action is in line with the entity's performance management framework.

SRS will ensure that a discloser understands the reason for SRS's administrative or management action.

- Compensation and other remedies; and  
A discloser (or any other employee or person) can seek compensation and other remedies through the courts if: (a) they suffer loss, damage or injury because of a disclosure; and (b) SRS failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. SRS encourages disclosers to seek independent legal advice.
- Civil, criminal and administrative liability protection.  
Civil liability is, for example, any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation).  
Criminal liability is, for example, attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure).

Administrative liability is, for example, disciplinary action for making the disclosure).  
The protections do not grant immunity for any misconduct a discloser has engaged in that is revealed in their disclosure.

These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the *Corporations Act 2001* (Cth).

## 7. How will SRS support disclosers and protect disclosers from detriment?

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SRS has adopted measures for supporting disclosers and protecting disclosers from detriment in practice. In practice, SRS will:

- protect the confidentiality of a discloser's identity – SRS will protect the confidentiality when initially dealing with a discloser. SRS will at all times not divulge a discloser's identity without the express, written consent of a discloser. Further, SRS will reduce the risk that the discloser will be identified from the information contained in a disclosure by undertaking the following:
  - all personal information or reference to the discloser witnessing an event will be redacted;
  - the discloser will be referred to in a gender-neutral context;
  - where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
  - disclosures will be handled and investigated by qualified staff.

SRS will also follow secure record-keeping and information sharing processes by following its privacy and record-keeping processes.

- protect disclosers from detrimental acts or omissions – SRS will follow the following measures and mechanisms for protecting disclosers from detrimental acts or omissions:
  - the whistleblower protection officer undertakes an assessment of the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
  - consideration of support services (including counselling or other professional or legal services) that are available to disclosers;
  - consideration strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
  - consideration of actions for protecting a discloser from risk of detriment—for example, the entity could allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;
  - implementation of processes for ensuring that management is aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser;
  - implement procedures including escalation on how a discloser can lodge a complaint if they have suffered detriment, and the actions the entity may take

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in response to such complaints (e.g. the complaint could be investigated as a separate matter by an officer who is not involved in dealing with disclosures and the investigation findings will be provided to the Board or Finance and Risk Subcommittee); and

- interventions for protecting a discloser if detriment has already occurred—for example, SRS will investigate and address the detrimental conduct, such as by taking disciplinary action, or the entity could allow the discloser to take extended leave, develop a career development plan for the discloser that includes new training and career opportunities, or offer compensation or other remedies.

A discloser may seek independent legal advice or contact regulatory bodies such as ASIC or the ATO if they believe they have suffered detriment.

Overall, SRS will establish processes for assessing and controlling the risk of detriment based on its existing risk management framework.

## 8. How does SRS handle and investigate a disclosure?

SRS adopts a 2-stage approach to handling and investigating a disclosure.

**Step 1 – Assessing a Disclosure** - SRS will assess each disclosure to determine whether it qualifies for protection and a formal, in-depth investigation is required.

**Step 2 – Investigating a Disclosure** - If an investigation is required, SRS will consider the timeframes for the investigation, whilst acknowledging that the process will vary depending on the nature of the disclosure. Without the discloser's consent, SRS cannot disclose information that is likely to lead to the identification of the discloser as part of its investigation process—unless: (a) the information does not include the discloser's identity; (b) SRS removes information relating to the discloser's identity or other information that is likely to lead to the identification of the discloser (e.g. the discloser's name, position title and other identifying details); and (c) it is reasonably necessary for investigating the issues raised in the disclosure.

There are limitations to the investigation process. SRS may not be able to undertake an investigation if it is not able to contact the discloser (e.g. if a disclosure is made anonymously and the discloser has refused to provide, or has not provided, a means of contacting them).

SRS adopts the following principles in undertaking investigations:

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- SRS will determine whether the location and time are appropriate for receiving a disclosure.
- The focus will be on substance rather than on the motive of disclosures
- SRS will ensure investigations follow best practice. Investigations will be objective, fair and independent whilst preserving the confidentiality of the investigation.
- SRS will keep a discloser informed if the discloser can be contacted (including through anonymous channels). This includes acknowledging a discloser after receiving their disclosure. The frequency and timeframe may vary depending on the nature of the disclosure.

Investigation findings will be documented, reported internally to the Finance and Risk Subcommittee and communicated to the discloser. The method for documenting and reporting the findings will depend on the nature of the disclosure. There may be circumstances where it may not be appropriate to provide details of an outcome to the discloser.

All disclosers will be provided with an avenue for review.

## **9. How will SRS ensure fair treatment of individuals mentioned in a disclosure?**

SRS strives to ensure the fair treatment of employees who are mentioned in a disclosure that qualifies for protection, including those who are the subject of a disclosure. The measures for ensuring fair treatment of individuals are mentioned below:

- Disclosures will be handled confidentially when it is practical and appropriate in the circumstances;
- Each disclosure will be assessed and may be the subject of an investigation;
- The objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported;
- When an investigation needs to be undertaken, the process will be objective, fair and independent;
- An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken – for example, if the disclosure will be the subject of an investigation; and
- An employee who is the subject of a disclosure may contact SRS's support services (e.g. counselling).

SRS will determine the most appropriate time to inform the individual who is the subject of a disclosure about the investigation, provided that they inform the individual before making any adverse finding against them. In some circumstances, informing the individual at an early stage of an investigation may compromise the effectiveness of the investigation, such as when there may be concerns that the individual may destroy information or the disclosure needs to be referred to ASIC, ATO or the police.

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## 10. How will SRS ensure this policy is easily accessible?

This policy will be made available to employees through internal filing systems and email.

SRS is committed to fostering a whistleblower culture and instilling a positive and open environment to whistleblowing. This policy will be promoted actively and regularly and will be widely disseminated to and easily accessible by disclosers within and outside SRS through upfront and ongoing education, training and briefing sessions for its employees and volunteers.

This policy will also be made available on the SRS website.

## 11. How will SRS monitor the effectiveness of this policy?

SRS recognises it is important for SRS to have mechanisms in place for monitoring the effectiveness of this policy and ensuring compliance with its legal obligations. In doing so, SRS:

- SRS has adopted oversight arrangements for ensuring its Board and Finance and Risk Subcommittee is kept informed about the effectiveness of this policy and related processes and procedures – and can intervene when necessary - while preserving confidentiality;
- SRS adopts a mechanism to enable matters to be escalated to the Board or the Finance and Risk Subcommittee when required; and
- Regular reporting is made to the Board and Finance and Risk Subcommittee.

## 12. When will this policy be reviewed?

The Board will review this policy and related processes and procedures at least every 2 years or earlier on an as-needs basis. In reviewing this policy, the Board will assess which aspects worked well and did not work well since the policy was last reviewed and would include a review of the following at a minimum:

- whether the scope and application of this policy remains appropriate, particularly if there have been changes to SRS's business;
- whether this policy and related processes and procedures are helpful and easy to understand;
- whether this policy and related processes and procedures reflect current legislation and regulations and current developments and best practice for managing disclosures;
- whether SRS's handling of disclosures and its protections and support for disclosers need to be improved.

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The Board will also consult with and seek feedback from its employees about the effectiveness of this policy and related processes and procedures.

SRS is also committed to rectifying any issues identified in the review in a timely manner.

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