



# Ethics & Whistleblower Services

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Managing your organisation’s reputation and demonstrating your commitment to being a good corporate citizen means having in place the necessary systems to enable your vision.

Encouraging employees to report wrongdoing (‘blow the Whistle’), and protecting them when they do, is an important part of corruption prevention in both public and private sector businesses and not-for-profit organisations.

Australia is looking at options for best practice legislation for whistleblowers to safely and reliably report fraud, corruption and wrongdoing. There is draft legislation in place “Treasury Laws Amendment”(Enhancing Whistleblowers Protections) Bill 2017 which is being debated in Federal Parliament. This legislation is likely to become law in the next few months. Now is the time for organisations and government agencies to assess their processes and act when it comes to effective Whistleblower approaches.

[An Ethics and Whistleblower Service for your organisation.](#)

Good governance starts at the top, and ideally pervades every level of an organisation, becoming part of its culture. If there is no opportunity to identify misconduct, then it can quickly become embedded, eating away at the

fabric of a great organisation.

Providing a confidential, easy to access and free hotline offering factual, emotional and practical support lifts the pressure from employees who detect wrongdoing.

Why this should be high on a Board’s agenda:

- **New legislation.** Sweeping new legislation is now a reality with the passing of the Treasury Laws Amendment Bill.
- **Engage your people as an employer of choice.** Active policies and procedures backed by a hotline supports and encourages reporting.
- **Provide assurance to your stakeholders.** There is growing demand among shareholders, stakeholders and the community for better Whistleblower governance.
- **Protect your brand.** An absent or ineffective Whistleblower program could mean staff go directly to the media, social channels or shareholders to air grievances.
- **Good corporate citizen.** Having a system in place for reporting wrongdoing is part of it.

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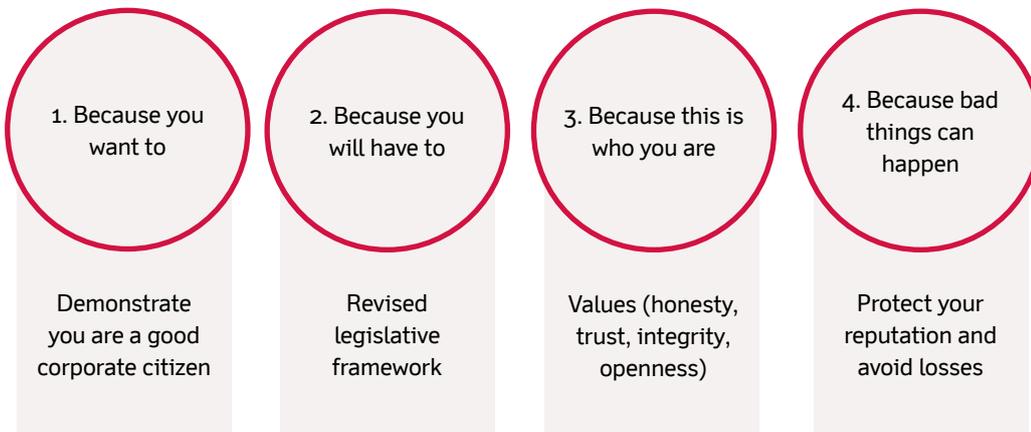
*A survey of 702 organisations by Griffith University found almost one in four organisations had no particular system for recording and tracking wrongdoing concerns and “did not currently have any strategy, program or process for supporting and protecting staff who raise concerns”.*

- Centre for Governance & Public Policy, Griffith University

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| 2010   | Dec 2016  | Sep 2017   | Dec 2017   | Feb 2019                                     | 1 Jul 2019  |
|--|---|--|--|--|---|
| Aus Gov commits to improving Whistleblower legislative framework at G20 Toronto Summit | Aus Gov releases National Action Plan: “Improve Whistleblower protections in the tax and corporate sectors” | Aus Gov launches Joint Committee into Whistleblower protections in corporate, public and NFP sectors | Aus Gov introduces the “Treasury Laws Amendment” Bill 2017 into Senate on 7 Dec 2017 | The Bill was passed into law on 19 Feb 2019. | Amendments likely to take effect, subject to Bill receiving Royal Assent. |

## Why a Whistleblower program is a good idea:



Whistleblower  
System Partner



Prosperity's partner, a leading global Whistleblower and ethics provider, **WhistleBlower Security**, is a world class service provider offering a truly independent hotline at the forefront of technology.

WhistleBlower Security is a Canadian based ethics and Whistleblower expert with global reach. Established for more than 14 years, the group has clients globally, including Boeing, First Quantum Minerals, GlaxoSmithKline, Bank of the West (subsidiary of BNP Paribas) and SunRice. They also service a number of smaller private companies and the not-for-profit sector.

### Data security

With data housed in Canada, WhistleBlower Security's data security and robust privacy compliance prevents unauthorised access to confidential information and complies with Australia's Privacy Act 1998 and the Australian Privacy Principles. Key data security protocols include:

- Information encryption via SSL certificate and via 2048-bits encryption.
- WhistleBlower Security adheres

to PIPEDA, FIPPA, and all privacy legislation, both locally and globally.

- Each client is assigned a unique ID, accessible only by those users attached to the unique ID.
- Anti-malware/anti-virus checks and updates every 4 hours automatically installed.
- Redundant virtual and network infrastructure - no downtime or data loss.
- Annual penetration testing.

WhistleBlower Security's systems and applications are available 24/7 via the cloud, providing clients with:

- Limitless scalability, reliability and business agility.
- Data security, privacy and control.
- Certified compliance with complex and evolving global attestations and accreditations.
- Compliance standards certified to more than six international codes.
- Rigorous independent audits, including by the British Standards Institution.

### How it works

The WhistleBlower Security Ethics Reporting System includes a 24/7 Global Ethics Hotline Service providing an efficient and trustworthy ethics reporting

process - helping employees, customers and suppliers feel safe and secure when reporting ethics and compliance issues. It facilitates anonymous and confidential dialogue between the reporter and your organisation's representative, whether initiated through the call centre, fax, email or the web. Each report is assigned a unique number and password, facilitating anonymous and confidential dialogue.

WhistleBlower Security's Canadian based call-centre professionals are well trained in empathetic and compassionate investigative techniques, offering an 'always live' human experience that ensures employees are protected and supported. This intelligent and trustworthy process promotes effective investigations, helping to build a culture of integrity.

WhistleBlower Security's service includes *IntegrityCounts™*, a proprietary Case Management System, providing an easy to use and customisable web-based confidential ethics reporting system. This highly intuitive system increases engagement between employees and organisations.

Employees can remain anonymous, while still enabling an organisation to complete an investigation through anonymous dialogue. Once a report is filed, your nominated representative will receive an instant communication.

The Case Management System enables nominated representatives to collect and record data from the hotline, from conversations with leaders and from other sources, into a single platform for consistent investigation, analysis and reporting on ethics related issues.

For more information about WhistleBlower Security, go to their website:  
[www.whistleblowersecurity.com](http://www.whistleblowersecurity.com).

#### About our Service

We help bring your Ethics and Whistleblower Program together. This includes deployment of the Whistleblower system, supported by development of appropriate policies and

procedures. We can assist the rollout through presentations and road shows and prepare you for ongoing training and awareness of your Whistleblower approach.

Prosperity will help to ensure your program complies with existing and new legislative frameworks and meets the benchmarks set by AS8004-2003 (Australian Standard on "Whistleblower Protection Programs for Entities").

We will provide the expertise to identify appropriate accountabilities and responsibilities for day to day management of the Whistleblower system, and incorporating Whistleblower reporting into your broader processes. When it comes to investigations,

Prosperity has the skills and experience to assist you with workplace conduct and investigative services, whether in the public or private sector. These include areas such as physical and sexual abuse allegations, code of conduct and ethics, fraud and financial investigations. We can assist in assessing reportable conduct under relevant legislations, such as the QLD Crime and Corruption Act 2011, the NSW Independent Commission Against Corruption Act 1998 and the Victorian Government's Independent Broad-base Anti-corruption Commission Act 2011. Our team has an intimate knowledge and understanding of the workplace legislative frameworks within which organisations need to operate.

## Managing ESG Risk and how we can help

Your Whistleblower Program is part of your overall Environmental, Social and Governance Framework (ESG) and the table below shows how we can help you tailor an appropriate Whistleblower Program to fit within your ESG framework.

*Code of Conduct, Ethical Behaviour Framework*

Prosperity can help you to develop, promote and rollout your Code of Conduct, Ethical Behaviour Framework and Policies and Procedures, including identifying responsibilities and accountabilities for ownership of the Whistleblower program.

*Ethics and Whistleblower System*

Prosperity can assist you to plan for and rollout this system across your organisation.

*Employment Processes*

We can help with pre-employment screening and induction processes to ensure new starters align with company values.

*IntegrityCounts™ Case Management*

We will help you optimise your use of the *IntegrityCounts™* Case Management System, powered by WhistleBlower Security, for information and data analytics.

*Oversight, Monitoring & Reporting*

Help you set up an ongoing program of refresh and review of your Whistleblower program and other reports on Code of Conduct matters and implement reporting processes to your Board and sub-committees.

*Investigations and Pre-Audit*

Investigations into cases reported through WhistleBlower Security and via other means. For government departments, we can provide pre-audit services in preparing for a regulation investigation.

*Whistleblower Program Review*

We can review your existing Whistleblower program for adequacy and effectiveness in meeting your needs.



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