

4.17 Reportable Events (NRSCH) Policy

1. Purpose

This policy sets out Link Wentworth's obligations on reportable events, consistent with NRSCH requirements.

2. Scope

This policy applies to all Link Wentworth activities.

3. Policy

Link Wentworth will notify its Primary Registrar (Registrar of Community Housing NSW) in a timely manner of:

- any changes in the affairs of the company which may have an adverse impact on its compliance with the community housing legislation
- any incident relating to its operations that may raise public concern
- any incident that may adversely affect the reputation of Link Wentworth and/or the community housing sector as a whole
- when required to do so in accordance with section 15(2)(h) of the National Law.

Guidelines for notification

A reportable incident refers to any serious event that compromises the quality of resident or asset services, the good governance or viability of Link Wentworth, and which may raise public concern about standards of probity. The following events are considered examples of events that Link Wentworth may report to the Primary Registrar:

- significant unplanned turnover and/or loss of senior staff or board members
- significant operational restructure, corporate mergers, de-mergers, or restructure
- plans to change corporate entity type
- new affiliations with other entities or significant changes to existing affiliations
- significant system failures, for example, unrecoverable data loss
- legal action against Link Wentworth associated with potential financial and/or reputational costs
- changes to Link Wentworth's constitution affecting the wind-up clause that was in place and deemed eligible under the National Law when Link Wentworth's registration was determined
- the non-routine investigation of Link Wentworth by external agencies (such as a funding body, law enforcement bodies or integrity agencies)
- a breach or potential breach of bank covenants
- any significant breach by a contractor of tenant privacy or Link's Contractor Code of Conduct
- any event that has resulted in serious injury or death
- any adverse media coverage, or potential adverse media coverage, about Link Wentworth, its tenants, or properties.

In addition, consistent with its conditions of registration under Part 3 section 15(2)(h) of the National Law, Link Wentworth will notify the Primary Registrar of any of the following occurrences, within the time specified.

Occurrence	Time Specified
i. A decision to appoint a voluntary administrator to Link Wentworth or a decision to wind up its affairs.	As soon as practicable after the decision.
ii. The appointment of a receiver to Link Wentworth.	As soon as practicable after Link Wentworth learns of the appointment.
iii. A decision to apply for the cancellation of Link Wentworth's registration.	As soon as practicable after the decision and at least 28 days before the application is made.
iv. A change in the affairs of Link Wentworth that may have an adverse impact on its compliance with the community housing legislation.	Before or no later than 72 hours after the change.
v. Any other occurrence notified in writing to Link Wentworth by the Primary Registrar.	Within the time specified in that notice.

Timing

The Registrar, the Chair (of the Board) and the Chair of the ARIC must be notified of any incident at the earliest practicable opportunity.

In most cases, this should occur within one business day of Link Wentworth becoming aware of an incident, but not longer than three business days afterward. The Registrar also requires that notification of occurrences within paragraphs 2 (iii) and (iv) above occur before the next scheduled meeting of the Board.

Notification Procedure

The CEO or the Chair will notify the primary Registrar (Registrar of Community Housing, NSW) in writing including that the report is made under Section 15(2)(h) of the National Law. An email trail is sufficient for this purpose. The written notification details:

- the incident, including when it happened, and the persons involved. In the interest of privacy, confidentiality or the presumption of innocence, the initial notification may remain de-identified until such time that an appropriate investigation is finalised.
- the action taken, or planned to be taken, by Link Wentworth in response to the incident
- the contact details of the person responsible for managing Link Wentworth's response the incident; and if any other regulators or external agencies have been notified of the incident.

The Registrar assesses the information contained in any notification to determine what actions or notifications are required under their internal processes.

Link Wentworth employees are required to perform their duties in accordance with this Policy and related procedures.

This Policy is subject to change at the discretion of Link Wentworth. A breach of any Link Wentworth policy may result in action being taken which may include disciplinary action.

4. Responsibility

Employees are responsible for reporting any reportable event under this policy to the Manager: Risk & Compliance, or any senior manager or executive leader.

Senior managers are responsible for proactively overseeing compliance with this policy and addressing any non-compliance by their direct reports in a timely manner.

Executive leaders are responsible for ensuring the policy addresses its purpose, is able to be implemented, and is kept current and approved by the ultimate approving body in accordance with the required review cycle.

5. Definitions

ARIC – Link Wentworth Audit, Risk and Improvement Committee

NRSCH – National Regulatory System for Community Housing

National Law – *Community Housing Providers (Adoption of National Law) Act 2012* (NSW)

6. Legislative or other applicable framework

- *Community Housing Providers (Adoption of National Law) Act 2012* (NSW)
- National Regulatory System for Community Housing (NRSCH)
- NRSCH – Provider Notifications to the Registrar: Guidelines National Community Housing Standards 5.2 (2010 Ed)

7. Privacy and Confidentiality

Link Wentworth has obligations and responsibilities under its Privacy Policy. Before releasing any information relating to the subject matter of this Policy, first refer to the Link Wentworth Privacy Policy and/or seek guidance from a member of the Executive Leadership Team or Manager: Risk and Compliance.

Approval, Policy Owner and Review Frequency

Policy type:	Committee Level
ELT owner:	Chief Financial Officer
Business owner:	Manager, Risk & Compliance
Ultimate Approval body:	ARIC
Review Frequency:	Every 2 years, or more frequently if circumstances warrant.

Approved by – Audit, Risk and Improvement Committee