Whistleblower Policy

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Purpose

The purpose of this policy is to:

- Provide an overall framework to acknowledge, assess, manage and respond to matters raised in Whistleblower disclosures in a fair, transparent, accessible, safe, culturally safe and timely manner
- Ensure that our Aged care workers and any other persons are encouraged and supported to raise concerns about our delivery of funded aged care services
- Ensure all responsible staff are aware of their role in the Whistleblower system to ensure there is a systematic approach to recording, reporting, resolving and following up Whistleblower disclosures
- Promote quality care and the safety of individuals receiving aged care services by ensuring that the Whistleblower system facilitates Whistleblower disclosures without fear of victimisation, persecution, retribution or personal detriment
- Ensure that the confidentiality of Whistleblower disclosures is maintained and, where relevant, the anonymity of the Discloser, and any other specified individual, is protected
- Ensure that Whistleblower disclosures contribute to the continuous improvement of the delivery of funded aged care services
- Highlight that if a Complaint or Feedback qualifies as ~~is~~ a Whistleblower disclosure in accordance with s547 of the Act, we will treat it under this policy unless the Discloser elects to have it treated as a Complaint or Feedback under the Feedback and Complaints Management Policy or elects to have it managed as a complaint to the Complaints Commissioner.

Authorisation

This policy is approved by the Board and issued under the authority of the Chief Executive Officer (CEO). The Board may authorise amendments to this policy at any time.

Scope

This Policy in alignment with the Act, extends the scope of protection in aged care where protections are already available to whistleblowers under other frameworks, such as the Corporations Act.

This Policy provides a Whistleblower protections regime for people who make a Disclosure where there are reasonable grounds to suspect that we have breached a provision of the Act.

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This policy does not apply to matters where the individual making the Disclosure does not have reasonable grounds to suspect a breach of the Act, such as malicious or unfounded allegations.

Definitions

Act	Means the Aged Care Act 2024 and the associated Aged Care Rules 2025.
Aged care worker	Means person meeting the definition in s 11(4) & (5) of the Act.
Complaint	Means an expression of dissatisfaction made to or about us related to our accommodation, care, services, staff or management where a response or resolution is expected or required. It may include wrongdoing or a Whistleblower disclosure that the Whistleblower elects to have treated as a Complaint or Feedback. It does not include a request for services, updates, information or review of a decision (if there is a review mechanism).
Complaints and Feedback Officer	Means the nominated individual who acts on behalf of the registered provider in receiving Complaints or Feedback.
Complaints and feedback system	Means the system for the management and resolution of Complaints and Feedback.
Consumer	Means an individual accessing funded aged care services from us.
Discloser	Means an individual who conveys a Complaint or Feedback or who has elected to have their Whistleblower disclosure treated as a Complaint or Feedback.
Disclosure	Means a Complaint, Feedback or a Whistleblower disclosure that is to be treated as a Complaint or Feedback.
Eligible recipient	Means an individual or entity to whom a Disclosure of information can be made to qualify for Whistleblower protection.
Feedback	Means an expression made to or about us related to our accommodation, care, services, staff or management that may be positive, negative or neutral.
Grievance	Means a formal complaint raised by an employee regarding any aspect of their employment.
Misconduct	Means a breach of the Act.

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Responsible person	Means a person meeting the definition in s 12 of the Act.
We/us	Means the registered provider.
Whistleblower	Means an individual who has reasonable grounds to suspect Misconduct and conveys that information to an Eligible recipient; and the Disclosure qualifies for Whistleblower protections under the Act.
Whistleblower disclosure	Means information disclosing reasonable grounds to suspect Misconduct conveyed to an Eligible recipient that qualifies for Whistleblower protections under the Act.
Whistleblower officer	Means the nominated individual who acts on behalf of the registered provider receiving, managing, investigating, resolving and responding to Whistleblower disclosures in line with this policy.
Whistleblower protections	Means the protections applying to Whistleblower disclosures prescribed by the Act.
Whistleblower system	Means the system for ensuring compliance with the Whistleblower protections.

Policy statement

As a registered aged care service provider, we are committed to high quality care and services, with an emphasis on continuous improvement.

We acknowledge that Whistleblower disclosures provide valuable insight into the care and services we provide and should be used to promote continuous improvement.

We encourage and support all Consumers (including those that have barriers such as cognitive impairment or language or cultural barriers), their representatives, registered supporters, staff, volunteers, contractors and other individuals to disclose information relating to wrongdoing. We foster a “blame-free” approach where the objective is to improve and not shift blame where things have gone wrong. All must have access to, and be made aware of, the Whistleblower system.

Consumers and staff have the right to feel safe and are encouraged and supported to disclose information without fear of victimisation, persecution, retribution or personal detriment. Whistleblower disclosures can be provided anonymously if preferred. Staff will treat all Consumer and other staff with respect, including those who make Whistleblower disclosures. Whistleblowers have the right to confidentiality when making Disclosures.

Huon Regional Care has engaged an independent external organisation Stopline to receive and manage whistleblower disclosures. This step has been taken so that people can safely and confidently raise concerns about inappropriate workplace behaviour, fraud, corruption and other issues that breach legislation under the Aged Care Act or other laws that operate concurrently with the Act.

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We ensure that all Whistleblower disclosures are managed, investigated, recorded and resolved. This includes ensuring that the Whistleblower system is accessible, timely and fair.

Important Information

This policy applies to information disclosing reasonable grounds to suspect that we may have breached the Act conveyed to an Eligible recipient that qualifies for Whistleblower protections under the Act.

Misconduct

This will broadly relate to Misconduct by registered providers, a Responsible person of the registered provider, or an Aged care worker of a registered provider.

Examples of Misconduct include:

- Failing to comply with the Act
- Discrimination, violence, exploitation, neglect and abuse
- Sexual Misconduct
- Victimising persons who have complained of Misconduct

Reasonable grounds and false claims

A Whistleblower must have reasonable grounds to suspect that the information indicates that we may have breached the Act. A Whistleblower disclosure may have serious consequences for the person(s) who are the subject of allegations of Misconduct. Knowingly make a false report or making a report without reasonable grounds as to truth or accuracy, is considered a serious breach of policy.

As such, this policy does not apply to matters where the individual making the Disclosure does not have reasonable grounds to suspect a breach of the Act, such as malicious or unfounded allegations.

If a Disclosure is made without reasonable grounds, such as a deliberately false Disclosure, the provider may decide to take disciplinary action against an individual, including by terminating employment.

Disclosures as Complaints or Feedback

This policy does not cover general complaints which do not relate to Misconduct, such as disagreements between colleagues or personal work-related grievances. These matters may be dealt with under Grievance Policy.

If a Complaint qualifies for both Whistleblower protections and Feedback and Complaints, the Whistleblower may elect to have their Disclosure dealt with as a Complaint or Feedback under the Feedback and Complaints Management Policy.

Eligible Recipients

Whistleblower disclosures can be made either verbally or in writing and must be made directly to any of the following Eligible recipients in order to qualify for the Whistleblower protections:

- the Whistleblower officer
- a Responsible person or

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- an Aged care worker of the provider

Disclosures can also be made to the following external parties:

- The Aged Care Quality and Safety Commissioner, the Complaints Commissioner or a member of the staff of the Aged Care Quality and Safety Commission
- The System Governor, or an official of the Department of Health and Aged Care
- A police officer
- An independent aged care advocate

Whistleblower Protections

In making a Whistleblower disclosure, the individual will be protected from:

- Civil, criminal or administrative liability, such as disciplinary action or defamation.
- Contractual or other remedies, such as breach of an employment contract leading to the termination of employment.

Whistleblowers are only protected from those consequences which flow from their making of the Whistleblower disclosure. An individual can still be subject to civil or criminal liability for the conduct of the individual which may be revealed by the Whistleblower disclosure.

Anonymity

If Whistleblowers request that their name, or any other individual named in the Disclosure remain anonymous, the Eligible recipients must take such steps as are reasonable in the circumstances to preserve the anonymity of the individuals named in the request.

The Eligible recipients may disclose the name of individuals in certain circumstances, such as where disclosing the name would prevent a serious threat to the health, safety or well-being of another individual. The Eligible recipients will consider other ways of lessening or preventing this risk before deciding to disclose a name.

Confidentiality

The following information is confidential information that cannot be disclosed, unless authorised, when a Whistleblower disclosure is made:

- The identity of the Whistleblower.
- Information that is likely to lead to the identification of the Whistleblower.
- Information the Whistleblower officer or other Eligible recipient obtained directly or indirectly because of the Whistleblower disclosure.

Revealing confidential information will be authorised if:

- It is made to Aged Care Quality and Safety Commissioner, the Complaints Commissioner or a member of the staff of the Aged Care Quality and Safety Commission, the System Governor or an official of the Department of Health and Aged Care, the Inspector-General of Aged Care or a police officer
- It is made to a legal practitioner for the purpose of obtaining legal advice or legal representation
- The Whistleblower consents
- It is necessary to lessen or prevent a serious threat to the safety, health or wellbeing of one or more individuals

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- It is made to a court, tribunal or Royal Commission
- The Whistleblower elects to have the Whistleblower disclosure managed or dealt with as a Complaint or Feedback
- The confidential information is in the public domain already and the original Disclosure was authorised

Confidential information that is not the identity of the Whistleblower and is reasonably necessary for dealing with the matter is allowed to be disclosed if the Whistleblower officer or other Eligible recipient takes all reasonable steps to reduce the risk that the Whistleblower will be identified by revealing the confidential information.

Victimisation

Whistleblowers are protected from any acts of the registered provider which cause detriment or threaten to cause detriment to the individual as a result of their Whistleblower disclosure.

A registered provider may be fined if they cause detriment or threaten to cause detriment to an individual (or an individual or entity associated with the Discloser) because they made, may have made or intend to make the Whistleblower disclosure.

This does not apply if the registered provider's conduct is administrative action that is reasonable to protect the Whistleblower from detriment.

Aged Care Workers

The anonymity, confidentiality and victimisation protections apply to Aged care workers or Responsible persons who make a Whistleblower disclosure.

The registered provider must ensure that Aged care workers, Responsible persons and associated providers comply with these protections as far as reasonably practicable.

If an individual makes a Disclosure that qualifies for Whistleblower protection to an Aged care worker or a Responsible person, the registered provider must take reasonable measures to ensure that the Aged care worker or Responsible person does not disclose the identity of the person making the Disclosure.

Whistleblower disclosures will be received, managed, investigating, resolved and responded to in accordance with the Whistleblower system.

Penalties for Registered Providers

A registered provider may be fined if they breach the anonymity, confidentiality or victimisation protections.

Individuals who have been victimised after making a Disclosure may seek an order from the court, including an order:

- Granting an injunction to prevent, stop or remedy the effects.
- Awarding compensation for loss, damage or injury suffered.
- Reinstatement of an individual.
- Exemplary damages.

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How to make a Whistleblower Disclosure

Form of Report

A Whistleblower disclosure under this policy can be made at any time (including out of normal business hours) either verbally or in writing. The Disclosure should include supporting documentation, the grounds for making the Disclosure and details of all relevant facts.

Anonymity

A Whistleblower disclosure can be made anonymously. A Whistleblower:

- Can choose to remain anonymous while making a Whistleblower disclosure, over the course of the investigation and after the investigation is finalised.
- Can refuse to answer questions that they feel could reveal their identity during follow-up conversations.
- May choose to adopt a pseudonym for the purposes of their Whistleblower disclosure, and not use their true name.
- Can request that their name, or any other individual named in the Disclosure, remains anonymous. A Whistleblower who wishes to remain anonymous should maintain ongoing two-way communication with the Whistleblower officer or other internal Eligible recipient, so we can ask any follow-up questions or provide Feedback.

Who to make a Whistleblower disclosure to

Whistleblower disclosures must be made directly to any of the Eligible recipients in order to qualify for the Whistleblower protections. The Whistleblower officer can be contacted in relation to any queries about the reporting process under this policy.

Internal Reporting

We encourage all Whistleblowers to consider making an internal Whistleblower disclosure in the first instance, as this will enable us to identify and address any Misconduct as early as possible.

In order to make an internal Whistleblower disclosure, the Whistleblower should contact one of the following Eligible recipients: Us, the Whistleblower officer, a Responsible person or an Aged care worker of the provider. Contact details are available in our published information or upon request from the Whistleblower officer.

Any Whistleblower disclosure received by one of our Responsible persons or an Aged care workers must be promptly forwarded to the Whistleblower officer and Eligible recipients will only provide the Whistleblower's identity to the Whistleblower officer where the Whistleblower has consented.

External Reporting

Although our preference is that a Whistleblower first contact an internal Eligible recipient, alternatively, the Whistleblower may also choose to make a Whistleblower disclosure directly to the following external parties:

- The Aged Care Quality and Safety Commissioner, the Complaints Commissioner or a member of the staff of the Aged Care Quality and Safety Commission.

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- The System Governor, or an official of the Department of Health and Aged Care.
- A police officer.
- An independent aged care advocate.

The Support we will provide

When we receive a Whistleblower disclosure, we will manage it in accordance with the Whistleblower system and take appropriate action as soon as is reasonably practicable after the Whistleblower disclosure is made. (Information about our Whistleblower system is found at the end of this document).

We will support the individual who makes the Whistleblower disclosure and any other individual or entity that employs or is associated with the individual.

We will ensure the fair treatment of any Responsible person or Aged care worker of the provider who is mentioned in the Whistleblower disclosure or to whom the Disclosure relates.

We will ensure that the identity of Whistleblowers is kept confidential and that they are protected from victimisation, persecution, retribution or personal detriment for making a Whistleblower disclosure in accordance with this Policy.

Protection of Whistleblowers – our responsibilities

The Whistleblower officer will safeguard the interests of Whistleblowers and will ensure the integrity of the reporting system. The Whistleblower officer is responsible for taking steps to safeguard the interests of the Whistleblower, including:

- Maintaining the privacy and confidentiality of the Whistleblower, including ensuring that communications and documentation are appropriately secured.
- Ensuring that all valid Whistleblower disclosures are taken seriously and investigated fairly.
- Keeping the Whistleblower informed of developments, including progress and outcome of the investigation.
- Upon receiving a Whistleblower disclosure, making an assessment of the risk to the Whistleblower of any detrimental treatment occurring and implementing any necessary procedures to appropriately address this risk.
- Monitoring the effectiveness of Whistleblower protections offered under this policy.

We will not disclose the Whistleblower's identity or information that is likely to lead to identification unless the Disclosure is authorised. It is illegal for a person to identify a Whistleblower or disclose information that is likely to lead to the identification of the Whistleblower, unless the Disclosure is authorised.

If there has been a breach of anonymity, confidentiality or victimisation, a Whistleblower may bring their concern to the attention of the Whistleblower officer or apply to the court for an order.

All Whistleblower disclosures will be confidential. However, when a report is investigated, it may be necessary to disclose the details of the allegations to certain of our Responsible persons, external persons involved in the investigation process, to relevant law enforcement agencies and/or as otherwise required or authorised by law. For example, under the 'open Disclosure requirements', we may also be required to inform Consumer, in some

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circumstances, of the relevant Misconduct that has been reported. In these contexts, we will ensure that all reasonable steps are taken to reduce the risk of the Whistleblower being identified without consent – for example, de-identifying names, locations and personal information.

All files and records created from an investigation will be handled confidentially and retained in secure files and any unauthorised release of information will be regarded as a breach of this policy. Access to information in relation to Whistleblower disclosures will be limited only to those persons requiring access for the purposes of this policy.

We are committed to protecting and respecting the rights of a Whistleblower and will ensure that the identity of Whistleblowers is kept confidential and that they are protected from victimisation, persecution, retribution or personal detriment for making a Whistleblower disclosure. We will not tolerate any victimisation, detrimental treatment or retaliatory action against a Whistleblower or against their colleagues, associates, or family. Any such treatment will be treated as serious Misconduct by us and may result in disciplinary action.

Subject to the operation of the Whistleblower protections:

- Administrative action that is reasonable to protect a Whistleblower from detriment (e.g. when the Whistleblower disclosure relates to wrongdoing in the Whistleblower's immediate work area) will not be considered to be detrimental conduct.
- Protecting a Whistleblower from detriment does not prevent us from managing a Whistleblower's unsatisfactory work performance in the normal course of our performance management framework (or taking disciplinary action against them when they have engaged in Misconduct).

The Whistleblower protections protect a Whistleblower against certain legal actions related to making a Whistleblower disclosure, including criminal prosecution, civil litigation, or administrative action. A Whistleblower may rely on this protection in their defence if they are the subject of an action for making a Whistleblower disclosure. However, Whistleblower protections do not grant immunity to a person for any Misconduct they were involved in that is revealed in the Disclosure.

Assessment of a Whistleblower disclosure

The Whistleblower officer (in conjunction with other relevant persons on our behalf, where applicable/required) will as soon as practicable after the Whistleblower disclosure is made review the Whistleblower disclosure to assess whether it qualifies for Whistleblower protections and falls within this policy, with:

- qualifying Whistleblower disclosures being referred for investigation by the Whistleblower officer or other person on our behalf; and
- non-qualifying reports requiring no investigation in line with this policy being notified to the Discloser.

The Whistleblower officer should ask the Whistleblower whether they would like to elect to have their Whistleblower disclosure dealt with as a Complaint or Feedback instead. Should the Whistleblower decide to have their Whistleblower disclosure managed as a Complaint or Feedback, this policy does not apply, and the Whistleblower disclosure will be dealt with under the Complaints and Feedback policy.

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In the case of a non-qualifying report, the Whistleblower officer should inform the Discloser that they may elect to have the report treated as a Complaint or Feedback.

The Whistleblower officer must consider whether the report discloses an incident that must be managed according to the incident management system and/or serious incident reporting requirements.

The Whistleblower officer will provide the CEO with an update on the outcome of all assessments made.

Investigation of a Whistleblower disclosure

The Whistleblower officer will carry out (or supervise) the investigation. Where necessary, the Whistleblower officer may use an external investigator or expert to conduct or assist with an investigation.

When an investigation relates to our CEO, Whistleblower officer or a member of the governing body, it will be directed to the chair of the governing body who will determine who the investigator will be. If it relates to the chair of the governing body, the other members of the governing body will determine who the investigator will be.

All reasonable steps will be taken to ensure that the investigation is conducted fairly, independently, without bias, in a timely manner having regard to the subject-matter and in accordance with procedural fairness. The Whistleblower officer may request further information from the Whistleblower in the course of the investigation.

All reasonable efforts will be made to preserve the confidentiality of the investigation, and the identity of the parties involved, including the anonymity of the Whistleblower where this has been requested. However, we may not be able to undertake an investigation (or an investigation may be limited) if we are not able to contact the Whistleblower or if the Whistleblower disclosure is made anonymously.

Without the Whistleblower's consent, we cannot disclose information that is contained in a Whistleblower disclosure as part of the investigation process, unless:

- the information does not include the Whistleblower's identity;
- we remove information relating to the Whistleblower's identity or other information likely to lead to identification; and
- it is reasonably necessary for investigating the issues raised in the Whistleblower disclosure.

Eligible recipients will need to forward the Disclosure to the Whistleblower officer for the purposes of conducting their investigation. Eligible recipients will not be breaching confidentiality by forwarding the Disclosure to the Whistleblower officer.

Individuals against whom an allegation is made must also be supported during the investigation process. Accordingly, we and the Whistleblower officer will take all reasonable steps to treat any person who is the subject of Whistleblower disclosure fairly, including by:

- Informing that person of the substance of the allegations that are the subject of the investigation.
- Offering that person a right to submit a response.

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- Informing that person about the substance of any adverse conclusion at the end of the investigation process.

Post Investigation

Reporting

At the end of an investigation, the Whistleblower officer must provide the CEO with a written report setting out the findings of the allegations and a summary of the evidence (whilst preserving confidentiality/anonymity as required). Findings may be that an allegation of Misconduct is fully substantiated; partially substantiated, not able to be substantiated, or disproven.

The CEO (or their delegate) will take appropriate action in relation to the investigation report, which may include requiring further investigations, recommending disciplinary action, referring the matter to the Board for determination and/or notifying regulatory bodies. Any findings that relate to criminal activity will be reported to the police and/or regulators.

Updates provided to the Whistleblower

The Whistleblower will be provided with periodic updates in relation to the status of any investigation (including that one has commenced), at such intervals and in such form to be determined by the Whistleblower officer (including, if necessary, through anonymous channels). To the extent permitted, the Whistleblower will be informed of the final findings of the investigation, however, they will not be entitled to receive a copy of the formal report.

Review of investigation findings

If the Whistleblower is not satisfied with the outcome of an investigation, they may request to the Whistleblower officer that a review be conducted (or lodge a Complaint with the Aged Care Quality and Safety Commissioner, the Complaints Commissioner or a member of the staff of the Aged Care Quality and Safety Commission).

- If the Whistleblower officer determines that a review should be conducted, it will be conducted by an investigator who was not involved in the handling and investigation of the original Disclosure (and will otherwise be conducted in the same manner as set out in this system).
- However, we are not obliged to reopen an investigation and we can conclude a review if we find that the original investigation was conducted properly, or new information is either not available or would not change the findings of the original investigation.

Continuous Improvement

The Whistleblower officer and/or the CEO, as the case may be, will ensure that:

- Improvements are made taking into account Whistleblower disclosures.
- The effectiveness of actions taken in response to Whistleblower disclosures and related outcomes are evaluated.
- The time taken for the resolution of each Whistleblower disclosures are recorded.
- Staff receive education and training in relation to the learnings from each Whistleblower disclosure if appropriate.

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Whistleblower System

Our Whistleblower system supports the operation of the Whistleblower protections under the Act and:

- Ensures that the identity of Whistleblowers is kept confidential and that they are protected from victimisation, persecution, retribution or personal detriment for making a Whistleblower disclosure.
- Enables individuals to disclose information to us, our Responsible persons or our Aged care workers.
- Enables Disclosures to be made orally and in writing, and anonymously.
- Will be reviewed at least annually and more frequently if required to ensure it meets all of the mandatory requirements of the Act and this policy.

We must undertake the following with respect to the Whistleblower system:

Prepare and keep up to date documents detailing the system and the roles and responsibilities of our Aged care workers and Responsible persons in relation to the system, which must be given to them.

Require our Aged care workers and Responsible persons to comply with the Whistleblower system, ensure they are aware of, and understand, their roles and responsibilities and train them about how the system works including about:

- How to handle personal information and data.
- How to recognise and respond to Whistleblower disclosures.
- Managing relationships and clearly communicating with Whistleblowers.
- When and how to escalate Whistleblower disclosures.
- Their roles and responsibilities.
- The roles of the: Complaints and Feedback officer in receiving and managing Complaints or Feedback; Eligible recipients in receiving Whistleblower disclosures; and Whistleblower officer in managing and resolving Whistleblower disclosures.
- The penalties for contravening subsection 550(1) of the Act (confidentiality of identity of Disclosers).
- Provide training about how the system works must be at least annually and when:
- When the person becomes an Aged care worker or Responsible person.
- When there is a change to how the system works that affects the person's roles and responsibilities in the system.
- When there is a change to the person's role that affects the person's roles and responsibilities in the system.
- Communicate regularly, and at least monthly, to our Aged care workers and Responsible persons that Whistleblower disclosures that qualify for protection under section 547 of the Act are welcome.

Policy Communication and Review

We will publish this policy in an accessible form that:

- Describes the Whistleblower protections, how a Whistleblower disclosure can be made to us and/or to other persons, and how we will manage and investigate the Whistleblower disclosure.

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- Explains the supports that we will provide and how we will ensure that the identity of Whistleblowers kept confidential and protected from victimisation, persecution, retribution or personal detriment for making a Whistleblower disclosure.
- Sets out what the Whistleblower can do if they suspect there has been a breach of the Whistleblower protections.

We will give the policy published in an accessible form to our Consumers, Aged care workers and Responsible persons and any person who requests the policy including a supporter of a Consumer.

We will help Consumer to understand how the Whistleblower system works and, if a Consumer needs it to understand the policy published in an accessible form, translate it or present it in an alternative format.

We will communicate regularly, and at least monthly, to our Aged care workers, Responsible persons and Consumer and their supporters that Whistleblower disclosures are welcome.

Laws that operate concurrently with the Act

We are required to also comply with the regime of Whistleblower protections under the Corporations Act. For details about the Whistleblower protections afforded for reporting corruption, fraud, tax evasion/avoidance and misconduct, please refer to the T*reasury Laws Amendment (Enhancing Whistleblower Protections)* Act 2019 (Cth) which primarily amends the *Corporations Act 2001* (Cth) and the *Taxation Administration Act 1953* (Cth).

Roles and responsibilities

Board	The Board is responsible for ensuring that risks are mitigated and managed effectively.
CEO	The CEO is responsible for implementing the Whistleblower Policy.
Managers / Supervisors	Managers and supervisors are responsible to ensure employees understand the difference between the Whistleblower Policy and the Grievance Policy; and ensure compliance.
Employees	Employees are responsible to undertake their role in alignment with organisational policies and procedures.
Quality and Compliance Lead	Is responsible for triaging complaints within the organisation and providing information to individuals about Whistleblowing Protections; seeking their consent to forward any complaints which fall within the parameters of a whistleblower complaint to Stopline.
Stopline	Stopline is the contracted organisation responsible for receiving and recording all Whistleblower disclosures from employees, contractors, suppliers and other stakeholders. Stopline will evaluate disclosures and redirect any which do not qualify. All disclosures will be forwarded to the Whistleblower Contact Officer.

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Whistleblower Contact Officer	The Whistleblower Contact Officer is responsible for investigating and managing Whistleblower Complaints in Stopline's document management system. If a disclosure concerns the Executive Manager People and Culture, Stopline will direct the disclosure to the Chief Executive Officer (CEO). If the disclosure concerns the CEO, Stopline will direct the disclosure to the Chair of the Board.

Breach of policy

Breaching whistleblower protections may result in disciplinary action or can result in significant civil penalties under the Act.

Legislation, standards and processes

Legislation

- Aged Care Act 2024 (Cth)
- Corporations Act 2001 (Cth)
- Tax Administration Act 1997 (Tas)
- Privacy Act 1988 (Cth)
- Public Interest Disclosure Act 2002 (Tas)

Alignment to standards

- All standards are potentially liable for a disclosure

Associated documents and processes

- Code of Conduct
- Feedback and Complaints Management Policy
- Grievance Policy
- Whistleblower information Sheet

Resources

- ASIC Regulatory Guide 270
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 Protections for corporate sector whistleblowers | ASIC
- Australian Charities and Not-for-profits Commission
- Fair Work Commission

Quality references

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Date released:	October 2025
Contact Officer:	Chief Executive Officer

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