



Whistleblower Protection Policy

Version: 6

Date: 1/07/2025

Next review due by: 06/2028

Developed by: Company Secretary

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Authorised by: Board of Directors

Issued To: All Employees

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PURPOSE

1 Purpose and application

1.1 Purpose

The Aged Care Act and Corporations Act both set out obligations on entities relating to Whistleblowers.

This policy and process has been implemented to ensure that:

- (a) the appropriate systems and processes relating to Whistleblowers are:
 - (i) in place to comply with the Aged Care Act and Corporations Act; and
 - (ii) communicated to Eligible Whistleblowers, Eligible Recipients, Aged Care Workers, individuals accessing FACS, their Supporters and all other relevant individuals,
- (b) individuals are aware of (in relation to both the Aged Care Act and Corporations Act):
 - (i) what disclosures may be protected disclosures and how such disclosures may be made;
 - (ii) the protections afforded to Whistleblowers;
 - (iii) how we will investigate disclosures;
 - (iv) how we will ensure fair treatment of individuals mentioned in disclosures and support individuals who make disclosures;
 - (v) how we will comply with our obligations to Whistleblowers at law.



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1.2 Objectives

We are committed to undertaking the delivery of FACS in an ethical, legal and culturally appropriate manner and we:

- (a) recognise the importance of transparency and accountability in our activities;
- (b) seek to promote an environment where appropriate concerns can be addressed through usual communication channels (eg raised by employees to their supervisors or by way of our complaints and feedback management system);
- (c) recognise that there may be instances where an individual does not feel comfortable using these channels, in which case disclosure may be made under this policy;
- (d) support the making of disclosures; and
- (e) will take all necessary steps to ensure that the required protections are afforded to individuals who make disclosures.

PEOPLE THIS POLICY APPLIES TO

1.3 Application

This policy and process applies to:

- (a) all individuals who may make, or receive, a disclosure, under the Aged Care Act, including Aged Care Workers, individuals accessing FACS and their Supporters and representatives;
- (b) all Eligible Whistleblowers and Eligible Recipients under the Corporations Act;
- (c) all employees responsible for the management of the processes and systems set out in this policy.

POLICY

2 Regulatory obligations and guidance material

This policy and process has been developed with reference to the following regulatory obligations, Quality Standards and guidance material:

- (a) the Aged Care Act, particularly Chapter 7, Part 5;
- (b) the Aged Care Rules, particularly Chapter 4, Part 10, Division 2, Subdivision D;
- (c) the Corporations Act, particularly Volume 6, Chapter 9, Part 9.4AAA;
- (d) the Revised Explanatory Memorandum relating to the Aged Care Act;
- (e) Information Sheet 238 released by ASIC.

3 What disclosures are protected?

3.1 Aged Care Act

- (a) A disclosure is protected under the Aged Care Act when it is disclosed orally or in writing to a person described in paragraph 4.1 and the discloser has reasonable grounds to suspect that



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the information included in the disclosure indicates that an entity may have contravened a provision of the Aged Care Act.

- (b) A disclosure may be made anonymously.
- (c) A Whistleblower may elect to have a disclosure managed as a complaint or feedback under the Aged Care Act. If a Whistleblower makes this election, they will not be afforded the protections set out in this policy.

3.2 Corporations Act

A disclosure is protected under the Corporations Act where it is made by an Eligible Whistleblower to an Eligible Recipient and the Eligible Whistleblower has reasonable grounds to suspect that the information included in the disclosure:

- (a) concerns misconduct, or an improper state of affairs or circumstances;
- (b) constitutes an offence against or contravention of a provision of the Corporations Act or:
 - (i) the *Australian Securities and Investments Commission Act 2001* (Cth);
 - (ii) the *Banking Act 1959* (Cth);
 - (iii) the *Financial Sector (Collection of Data) Act 2001* (Cth);
 - (iv) the *Insurance Act 1973* (Cth);
 - (v) the *Life Insurance Act 1995* (Cth);
 - (vi) the *National Consumer Credit Protection Act 2009* (Cth);
 - (vii) the *Superannuation Industry (Supervision) Act 1993* (Cth);
- (c) constitutes an offence against any other law of the Commonwealth which is punishable by imprisonment for a period of 12 months or more; or
- (d) represents a danger to the public or the financial system.

3.3 Personal Work-Related Grievances – Corporations Act

This policy does not apply to a disclosure relating to a Personal Work-Related Grievance unless that Personal Work-Related Grievance:

- (a) has significant implications for us which do not relate to the discloser; and
- (b) does not concern conduct, or alleged conduct referred to in paragraph 3.2 or any Victimisation or Threats of Victimisation.

4 Who can receive a disclosure?

The Registered Provider has engaged the Independent Reporting Line (Stopline) to receive disclosures. Disclosures to the Independent Reporting Line will qualify for protection under the Aged Care Act and the Corporations Act.

Stopline, contact details are set out below:

Phone 1300 30 45 50

Email: regis@stopline.com.au

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Website: <http://regis.stoplinereport.com>

Post: Regis, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia

Although the Registered Provider prefers that disclosures intended for its Responsible Persons and Aged Care Workers be made through the Stopline, such disclosures may also be directed to any of the Eligible Recipients as specified in clauses 4.1 and 4.2.

4.1 **Aged Care Act**

A disclosure qualifies for protection if it is made to:

- (a) an Appointed Commissioner or a member of the staff of the Commission;
- (b) the System Governor, or an official of the Department;
- (c) a Registered Provider;
- (d) a Responsible Person of the Registered Provider;
- (e) an Aged Care Worker of a Registered Provider;
- (f) a police officer; or
- (g) an Independent Aged Care Advocate.

4.2 **Corporations Act**

A disclosure qualifies for protection if it is made to:

- (a) an officer or senior manager of the Registered Provider;
- (b) an auditor, or a member of an audit team conducting an audit, of the Registered Provider;
- (c) an actuary of the Registered Provider;
- (d) an individual authorised by the Registered Provider to receive disclosures that may qualify for protection;
- (e) a legal practitioner for the purpose of obtaining legal advice or legal representation;
- (f) ASIC;
- (g) APRA (though we are not in the business of superannuation and so the entity may not deal with the disclosure); or
- (h) a Commonwealth authority otherwise prescribed to receive disclosures,

(Recipients listed under clause 4.1 and 4.2 are each, including the Independent Reporting Line, **Eligible Recipients**).

5 **Who can make a disclosure?**

5.1 **Aged Care Act**

Individuals can make disclosures under the Aged Care Act. This includes:

- (a) all Aged Care Workers and other staff or volunteers;
- (b) individuals accessing FACS and their Supporters;

- (c) any other individual who becomes aware of information a disclosure of which would be protected under the Aged Care Act.

5.2 Corporations Act

An individual who is or has been:

- (a) an officer, being a director or company secretary;
 - (b) an employee;
 - (c) an individual who supplies services or goods, or any employee of such an individual;
 - (d) an associate;
 - (e) a relative of any individual referred to in paragraphs 5.2(a) –5.2(d) (inclusive); or
 - (f) a dependent of an individual referred to in paragraphs 5.2(a) –5.2(d) (inclusive),
- (Disclosers listed under clauses 5.1 and 5.2 are each, **Eligible Whistleblowers**).

6 Internal and External Disclosures

6.1 Internal Disclosures

Whistleblowers may make disclosures to the Independent Reporting Line, or any of the individuals described in paragraphs 4.1 and 4.2 depending on the nature of the disclosure.

6.2 External Disclosures

Whistleblowers may elect to make disclosures to external bodies as described in paragraphs 4.1 and 4.2.

These disclosures may be made securely in accordance with the whistleblowing policies in respect of each entity to whom the external disclosure is made.

7 What protections are available to Whistleblowers?

7.1 Victimisation

- (a) Under both the Aged Care Act and Corporations Act, Victimisation of any Whistleblower, or Threats of Victimisation directed towards Whistleblowers, are prohibited.
- (b) We will not engage in, or tolerate, any Victimisation, or Threats of Victimisation, where such behaviour is due to the belief or suspicion that an individual has, may have or intends to make, a disclosure.
- (c) Where an individual is victimised because of a disclosure (or the belief or suspicion of a disclosure) this must be reported to the Whistleblower Reporting Manager by the Whistleblower or any other individual who becomes aware of the Victimisation.
- (d) Individuals who engage in Victimisation may be subject to disciplinary action. Victimisation may also be deemed a contravention of the Aged Care Act or Corporations Act resulting in penalties.
- (e) Under the whistleblowing provisions of the Aged Care Act, we may engage in reasonable administrative action that is reasonable to protect a Whistleblower.



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7.2 Confidentiality

- (a) We will not reveal the identity of any Whistleblower where we obtain information relating to the identity of a Whistleblower by way of a disclosure.
- (b) There are a number of exceptions under which we may reveal the identity of a Whistleblower, including where we notify:
 - (i) under the Aged Care Act:
 - (A) an Appointed Commissioner or a member of the staff of the Commission;
 - (B) the System Governor, or an official of the Department;
 - (C) a police officer;
 - (D) a legal practitioner for the purpose of obtaining legal advice or legal representation;
 - (E) any other individual, with the consent of the discloser.
 - (ii) under the Corporations Act:
 - (A) ASIC;
 - (B) APRA;
 - (C) a member of the Australian Federal Police;
 - (D) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the disclosure; or
 - (E) any other individual, with the consent of the discloser.
- (c) We may otherwise use any information disclosed by a Whistleblower (but not the identity of the discloser) which is reasonably necessary to deal with the allegations or claims made under the disclosure provided that we take all reasonable steps to reduce the risk that the Whistleblower will be identified.

7.3 Anonymity – Aged Care Act

- (a) Under the Aged Care Act, a Whistleblower may request that they, or any individual named in the disclosure, remain anonymous. If so, we must take such steps as reasonable to preserve the anonymity of such individuals.
- (b) Where a Whistleblower chooses to remain anonymous, this may affect our ability to investigate and properly communicate with the Whistleblower about the disclosure.
- (c) Where disclosure of the name of the discloser or an individual is necessary to lessen or prevent a serious threat to the health, safety or well-being of another individual, disclosing the identity of Whistleblowers or other individuals named in the disclosure may be reasonable but not where the threat can be lessened without naming them.

7.4 Protection from Liability

- (a) Under both the Aged Care Act and Corporations Act, Whistleblowers are protected from:

- (i) any civil, criminal or administrative liability (including disciplinary action) for making a disclosure;
- (ii) any contractual or other kind of remedy being enforced or exercised against the Whistleblower on the basis of the disclosure, including termination on the basis that disclosure constitutes breach of the contract.
- (b) The Whistleblower may still be subject to civil or criminal liability for any conduct revealed by the disclosure.
- (c) The Corporations Act contains an additional protection so that information in a disclosure is not admissible as evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty (other than where the proceedings relate to the falsity of the information).

8 How will we investigate following a whistleblowing disclosure?

- (a) Any individual receiving a disclosure under this policy must ensure that the disclosure is managed in accordance with this policy. This is to ensure that the protections available for Whistleblowers are not compromised and that we can meet our obligations under the Aged Care Act and Corporations Act.
- (b) All disclosures will be treated seriously and, where appropriate, will be thoroughly investigated in accordance with this policy. Investigations will be conducted in accordance with the table in paragraph 10.
- (c) All disclosures made to us will be treated seriously and appropriate action will be taken as soon as practicable after the disclosure is made. Where appropriate, this will include an investigation by the Whistleblower Reporting Manager.
- (d) The objective of such an investigation will be to locate evidence in relation to the claims and allegations in any disclosure and to determine the veracity of such claims.

8.2 Steps to protect confidentiality

In conducting all investigations, we will take steps to reduce the risk of the Whistleblower being identified, including:

- (a) redacting, as appropriate, personal information or references to the Whistleblower witnessing an event;
- (b) referring to a Whistleblower in a gender-neutral context;
- (c) where possible, contacting the Whistleblower (if known) to help identify certain aspects of their disclosure that could inadvertently identify them; and
- (d) having investigations and handling of disclosures being handled by qualified and appropriate staff.

8.3 Secure record-keeping

We will take steps to ensure secure record-keeping and information sharing processes, including:

- (a) storing all paper and electronic documents and other materials relating to disclosures securely;

- (b) limiting access to information relating to a disclosure to those directly involved in managing and investigating the disclosure;
- (c) limiting knowledge of the Whistleblower's identity, or information likely to lead to the identification of the Whistleblower, to those involved in handling the investigation;
- (d) communications and documents relating to the investigation of a disclosure will not be sent to an email address or a printer that can be accessed by other staff; and
- (e) employees involved in investigating a disclosure will have knowledge of our requirements in dealing with Whistleblowers and disclosures.

8.4 **Steps to support Whistleblowers and ensure fair treatment of Whistleblowers and individuals the subject of disclosures**

- (a) We will support all Whistleblowers while a disclosure is being investigated, including by:
 - (i) assessing the immediate welfare and protection needs of any Whistleblower;
 - (ii) safeguarding the interests of a Whistleblower in accordance with this policy and our obligations under the Aged Care Act and Corporations Act;
 - (iii) addressing any issues or concerns of Victimisation, Threats of Victimisation or Detriment.
- (b) In accordance with paragraph 7.1, Victimisation and Threats of Victimisation will not be tolerated and any Whistleblowers who have a reasonable belief that they are being Victimised as a result of any disclosure (or the belief or suspicion of a disclosure) must report this behaviour to the Whistleblower Reporting Manager.
- (c) Recipients of disclosures will receive education and training to ensure that they can identify Victimisation and so that they do not engage in Victimisation.
- (d) Individuals the subject of disclosures will not be subject to Victimisation.
- (e) Where, as a result of investigating a disclosure, evidence is found which confirms any claims or allegations of misconduct or contravention of the Aged Care Act or Corporations Act on the part of an individual identified in a disclosure, action may then be taken against that individual.

9 **Public Interest Disclosures – Corporations Act**

- (a) In certain public interest or emergency circumstances a disclosure may be made to a member of Parliament or journalist. This may only be done for disclosures under the Corporations Act (paragraph 3.2).
- (b) A discloser may wish to contact a legal practitioner to obtain assistance in understanding the criteria for making a public interest or emergency disclosure.

9.2 **Public Interest**

Public interest disclosures may only be made where:

- (a) the Whistleblower has already made a disclosure to us that qualifies for protection under the Corporations Act;

- (b) at least 90 days have passed since the disclosure;
- (c) the Whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters in the disclosure;
- (d) the Whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest;
- (e) after the 90 day period elapses, the Whistleblower provides written notice to us that includes information to identify the previous disclosure and states their intention to make a public interest disclosure.

9.3 Emergency Disclosure

Emergency disclosures may only be made where:

- (a) the Whistleblower has already made a disclosure that qualifies for protection under the Corporations Act;
- (b) the Whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more individuals or to the natural environment;
- (c) the Whistleblower provides written notice to us that includes information to identify the previous disclosure and states their intention to make a public interest disclosure.

10 Process

Step/action required	Accountability
1 Monthly Communication Develop and implement processes to communicate at least monthly that disclosures are welcome. The communications must be provided to: (a) Aged Care Workers; (b) Responsible Persons; (c) individuals who receive FACS; (d) any other individuals who request the policy and are Supporters; (e) any other individuals who request a copy of the policy.	CPO CPO EGM Operations
2 Reporting Disclosures – Aged Care Act Aged Care Workers, Responsible Persons and any other individuals who may receive disclosures in accordance with	Aged Care Workers Responsible Persons Any other employees who may receive



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Step/action required	Accountability
paragraph 4.1 must report any disclosures made to them, as soon as practicable, to the Whistleblower Reporting Manager.	disclosures under paragraph 4.1.
3 Reporting Disclosures – Corporations Act Eligible Recipients must report any disclosures covered by paragraph 4.2, and received by them, as soon as practicable, to the Whistleblower Reporting Manager.	Eligible Whistleblowers Eligible Recipients
4 Investigation Process Investigations will be conducted as follows in relation to disclosures but may vary based on the nature of the disclosure and whether the Whistleblower is anonymous: (a) the Whistleblower Reporting Manager or their delegate will: (i) review the disclosure; (ii) assess the disclosure to determine whether it falls within the scope of this policy; (iii) assess the risk of Victimisation or Threats of Victimisation in relation to the Whistleblower (if any); (iv) where the Whistleblower is contactable, ask for consent to contact the Whistleblower in order to gather any additional evidence and to confirm receipt of the disclosure (within a reasonable time); (v) where appropriate, inform the Whistleblower as to how the investigation will proceed; (vi) determine the next steps (for example, confirming that an investigation is required), (b) the Whistleblower Reporting Manager will oversee the investigation which may be conducted in consultation with other employees or external legal or investigative advisors, where necessary;	Whistleblower Reporting Manager



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Step/action required	Accountability
(c) the investigation of a disclosure may include (without limitation): (i) interviewing the Whistleblower and any other relevant persons to obtain information about the disclosure; (ii) reviewing any relevant documents and other information in relation to the disclosure; (d) the Whistleblower Reporting Manager, or any other internal or external participant in the investigation, may prepare an investigation report setting out the findings of the investigation; (e) where appropriate, the Whistleblower Reporting Manager may advise and debrief the Whistleblower; (f) upon conclusion of the investigation, the investigation report will be provided to the CEO] and the CEO will determine the response. If the CEO is the subject of a disclosure, the Board will determine the response. Responses may include: (a) addressing any unacceptable conduct; (b) implementing remedial action required to prevent reoccurrence of any conduct; (c) referral of the matter or individuals involved to the People and Culture team; (d) no response (where there is insufficient evidence to justify the claims or allegations).	



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Step/action required	Accountability
5 Disclosures determined not to be a protected Disclosure In the event the disclosure is determined to be a Personal Work Related Grievance and falls outside the scope of this policy, the Whistleblower Reporting Manager will: a) determine whether the matter should be referred for attention under another policy; and b) advise the person making the disclosure that the disclosure is not a protected disclosure and any referral of the disclosure for attention under another policy.	Whistleblower Reporting Manager
6 Review This policy must be reviewed every three years.	Company Secretary

DEFINITIONS

7 Dictionary

Aged Care Act	means the <i>Aged Care Act 2024</i> (Cth).
Aged Care Rules	means the <i>Aged Care Rules 2025</i> (Cth).
Aged Care Worker	means: (a) an individual employed or otherwise engaged (including as a volunteer) by us to deliver FACS; or (b) an individual who: (i) is employed or otherwise engaged (including as a volunteer) by an associated provider; and (ii) is engaging in conduct under the associated provider's arrangement with us relating to the registered provider's delivery of FACS; or (c) an individual who is a registered provider.
Appointed Commissioner	means the Commissioner or Complaints Commissioner of the Commission.
APRA	means the Australian Prudential Regulation Authority.
ASIC	means the Australian Securities and Investments Commission.
CEO	means the Chief Executive Officer.
Commission (ACQSC)	means the Aged Care Quality and Safety Commission.
Corporations Act	means the <i>Corporations Act 2001</i> (Cth).
Detriment	includes (without limitation): (a) dismissal of an employee; (b) injury of an employee in his or her employment; (c) alteration of an employee's position or duties to his or her disadvantage; (d) discrimination; (e) harassment or intimidation of an individual; (f) harm or injury to an individual, including psychological harm; (g) damage to an individual's property; (h) damage to a individual's reputation; (i) damage to an individual's business or financial position; (j) threats of reprisal.



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Eligible Whistleblower has the meaning in paragraph 5.2.

Eligible Recipient has the meaning in paragraph 4.2.

FACS means funded aged care services as defined in section 9 of the Aged Care Act.

Independent Aged Care Advocate means a person who:

- (a) is independent of the System Governor, the Commission and any registered providers; and
- (b) is employed or otherwise engaged by a person or body that receives financial assistance under the Aged Care Act; and
- (c) provides either or both of the following to individuals accessing, or seeking to access, FACS:
 - (i) free, independent and confidential support, information and advocacy;
 - (ii) education about the rights of individuals under the Statement of Rights; and
- (d) where providing free, independent and confidential support, information or advocacy, acts at the direction of the individual, reflecting the individual's expressed wishes, will, preferences, interests and rights.

Personal Work-Related Grievance means:

- (a) information which concerns a grievance about any matter in relation to the discloser's employment, or former employment, having (or tending to have) implications for the discloser personally;
- (b) information which:
 - (i) does not have significant implications for the entity to which it relates, or another entity, that do not relate to the discloser; and
 - (ii) does not concern conduct, or alleged conduct, referred to in paragraph 3.2.

Registered Provider

means:

- (a) for the purposes of the Aged Care Act, a registered provider as defined under section 11(2) of the Aged Care Act; and
- (b) for the purposes of the Corporations Act, a body corporate or related body corporate under sections 15 and 50 of the Corporations Act.

Responsible Person

means:

- (a) any person who is responsible for executive decisions (including members of the governing body);
- (b) any other person who has authority or responsibility for (or significant influence over) planning, directing or controlling our activities;
- (c) any person who has responsibility for overall management of the nursing services delivered by us, or overall management of the nursing services delivered at one of our approved residential care homes, and who is a registered nurse;
- (d) any person who is responsible for the day-to-day operations of an approved residential care home or service delivery branch.

Supporter

of an individual, means an individual registered as a supporter of the individual under section 37 of the Aged Care Act.

System Governor

means the Secretary of the Department of Health and Aged Care.

Threat of Victimisation

means a threat of Victimisation which intends the individual to fear that the threat will be carried out or is reckless as to causing the individual to fear that the threat will be carried out.

A threat may be express or implied and/or conditional or unconditional.

Victimisation

means conduct which causes any Detriment to an individual or to another entity which employs or is otherwise associated with the individual and the conduct is undertaken solely or partly because the entity believes or suspects that the individual or another individual has, may have, or intends to make, a disclosure that qualifies for protection.



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Whistleblower

For the purposes of a disclosure under the Aged Care Act, means an individual who:

- (a) is a person described in paragraph 5.1 who makes a disclosure as described in paragraph 3.1; and
- (b) is an Eligible Whistleblower who makes a disclosure as described in paragraph 3.2.

Whistleblower Reporting Manager

means the Company Secretary or their delegate. In the event a disclosure is in relation to the actions of the Company Secretary, the Whistleblower Reporting Manager shall be the Chief People Officer.

KEY LEGISLATION, ACTS AND REFERENCES

As per definition – and identified above

LINK TO STANDARDS

Standard 1	The Individual	☐
Standard 2	The Organisation	☒
Standard 3	The Care and Services	☐
Standard 4	The Environment	☐
Standard 5	Clinical Care	☐
Standard 6	Food and Nutrition	☐
Standard 7	The Residential Community	☐

NDIS	Core Module - Rights and Responsibilities	☐
NDIS	Core Module - Provider Governance and Operational Management	☒
NDIS	Core Module - Provision of Supports	☐

LINK TO RELATED POLICIES, PROCESSES AND DOCUMENTS

- Regis Staff Handbook
- Code of Conduct (The Regis Way) Policy

KEYWORDS

N/A

VERSION HISTORY / AUTHOR / CONTRIBUTORS



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5	15/06/2022	Updated to new policy template and to ensure currency of information	Legal
6	11/06/2025	Full review and replacement of policy for compliance with the Strengthened Standards and Aged Care Act 2024.	Legal