



# Whistleblower Program

## Whistleblower Program Overview and Objectives

A whistleblower is a person who makes a disclosure outside our existing internal reporting procedures with respect to actual or suspected wrongdoing, including the occurrence of a SIRS reportable incident, serious misconduct such as corruption, fraud or other illegal or undesirable activity, or any breach of the provisions of the Aged Care Act 2024 (Cth).

We recognise that people who have a work, service or customer relationship with Whittlesea Lodge are often best placed to identify illegal or other undesirable activity. Without a whistleblower program, people who see or suspect serious wrongdoing may remain silent for various reasons, including that:

- there is not a clear mechanism for them to speak up
- they are concerned that they may not have sufficient evidence to support their disclosure
- they believe that action will not be taken
- they believe that they may suffer detriment if they report the matter.

## Whistleblower Program Objectives

This Whistleblower Program documents the internal governance mechanisms that Whittlesea Lodge must implement and maintain in order to ensure that whistleblowers are made aware of their rights and feel comfortable that they can make a whistleblower disclosure without fear of recrimination or reprisal.

The objectives of our Whistleblower Program are to:

- encourage and enable individuals to disclose actual or suspected wrongdoing knowing that their concerns will be taken seriously and investigated
- give effect to whistleblower laws that prohibit regulated entities from taking adverse action against a whistleblower

- provide clearly articulated guidance on how to disclose actual or suspected wrongdoing
- provide a safe and confidential environment where individuals can raise reasonable concerns without fear of reprisal, even if their suspicions are not confirmed on investigation
- enable Whittlesea Lodge to deal effectively with whistleblower disclosures in a transparent and timely way that protects the identity of the whistleblower, provides fair treatment to persons named in whistleblower disclosures, facilitates appropriate investigation of whistleblower disclosures and provides for the secure storage of the information provided and gathered
- establish policies and procedures for protecting whistleblowers from retaliation, harassment or victimisation
- provide for the appropriate governance infrastructure to enable the effective implementation and maintain our whistleblower procedures.

## Our Governance Framework

It is important to recognise that our Whistleblower Program does not stand alone but rather is an integral part of our overall governance framework. Whittlesea Lodge has established the following internal reporting procedures designed to allow key stakeholders to raise concerns in the normal course of business:

- Incident Management – designed to manage and prevent incidents and meet the requirements of the SIRS
- [Internal Grievance Procedures](#) – designed to capture personal work-related grievances of staff
- [Feedback and Complaints Handling Procedures](#) – designed to capture feedback and complaints from third parties
- [Occupational Health and Safety Notifications](#) – our OHS Program is designed to capture information with respect to workplace hazards and incidents
- [Privacy Incidents and Breaches](#) – our Privacy Program is designed to capture information with respect to privacy incidents and concerns.

## Whistleblower Policy

To ensure the transparency and accessibility of our Whistleblower Program we have developed a [Whistleblower Policy](#) (replicating the key elements of this Program) that is available to all key stakeholders through our public website.

## Training of Staff

Whittlesea Lodge is committed to training its Board members and staff on the importance of reporting actual and suspected wrongdoing, as well as emphasising the undesirability of false or vexatious reporting.

To this end, Whittlesea Lodge has developed an internal Whistleblower Learning Course that is provided to all new Board members and staff as part of our induction program and on an ongoing basis as required.

## **Disciplinary Action**

The reporting of actual or suspected wrongdoing and the subsequent management of investigations and whistleblower protections are highly sensitive issues that require strict compliance with the terms of this Program, including that:

- information contained in whistleblower disclosures must not be released without authority to any person who is not involved in the investigation or resolution of the matter, unless required by law, or as outlined in this Program
- the identity, or any information that may lead to the identification of a whistleblower, must not be released to any person, unless required by law or as outlined in this Program
- a person must not knowingly make a false whistleblower disclosure.

A breach of our Whistleblower Program will be regarded as serious misconduct and a disciplinary matter.

## **Allocation of Resources**

To support the effective implementation and maintenance of our Whistleblower Program, Whittlesea Lodge has allocated the following resources:

- appointment of a senior staff member as our GM/Board
- appointment of senior staff members as our Whistleblower Protection Officers
- appointment of External Whistleblower Service Provider as an External Whistleblower Service