Whistleblower Policy – Resident and Client

Policy Statement
Catholic Homes Incorporated (CHI) is committed to providing safe, respectful and high-quality care. We want residents, clients, families, friends and supporters to feel confident to speak up if something is not right.

Speaking up helps CHI protect the people we care for, meet our obligations under the Aged Care Act, and continuously improve the quality and safety of our services.

CHI will treat all whistleblower disclosures seriously, handle them sensitively, protect confidentiality, and ensure no person is disadvantaged for raising a concern in good faith.

Purpose
This policy explains how CHI:
- Supports and protects residents, clients and their supporters who speak up about serious concerns.
- Keeps identities confidential and allows anonymous reporting.
- Determines whether whistleblower protections apply under the Aged Care Act.
- Responds to, investigates and manages disclosures.
- Ensures people are treated fairly and are not victimised for raising concerns.

Target Audience/Scope
This policy applies to:
- Residents living in CHI residences.
- Clients receiving CHI services in their homes or elsewhere.
- Family members, friends, advocates and supporters of residents and clients.
- Members of the community who raise concerns about CHI's care or services.

This policy covers disclosures about serious matters such as:
- Quality or safety of care.
- Abuse, neglect or inappropriate treatment.
- Breaches of the Aged Care Act, Quality Standards or Code of Conduct
- Theft, financial coercion or misuse of funds.
- Other conduct that may place people at risk.

Employees and Contractors are covered under the *Whistleblower Policy – Workforce*.

Definitions

Term	Definition
Client / Resident	An individual receiving services from CHI, encompassing Home Care, Residential Aged Care, and Independent Living.
Protected Disclosure	A disclosure that qualifies for protection under the Aged Care Act and/or Corporations Act when it relates to: • information that indicates a possible contravention of the Aged Care Act, or • is made by a Whistleblower (such as a resident, client, or their supporter), and • is made to the Whistleblower Officer, a Responsible Person, or an authorised external body. A Protected Disclosure may also be a complaint, incident or other form of feedback, and may be managed alongside CHI's complaints, incident management or open disclosure processes.
Responsible Person	Means any person who is: • responsible for Executive decisions at CHI; or • responsible for planning, directing or controlling the activities of CHI; or • responsible for overall management of CHI nursing services; or

Term	Definition
	responsible for the day-to-day operations of a CHI residential care home or home care service delivery.
Supporter	A Client or Resident's family member, friend, advocate, guardian or other registered supporter, in accordance with the Aged Care Act 2024.
Whistleblower	A person who reports a serious concern under this policy.
Whistleblower Officer	The CHI employee responsible for receiving and managing whistleblower disclosures.

Policy Details

Key principles

This policy is guided by the following principles:

- ***Respect and fairness:*** people who speak up will be listened to and treated with dignity.
- Cultural safety: CHI respects the identity, values and voices of people from different backgrounds.
- ***Confidentiality and anonymity:*** identities will be protected, and anonymous disclosures are accepted.
- ***No retaliation:*** CHI does not tolerate victimisation or disadvantage for raising concerns in good faith.
- ***Accessibility and support:*** CHI makes it easy to raise concerns and provides support throughout the process.
- ***Continuous improvement:*** disclosures help CHI learn, address risks and improve care.

What can be reported

A disclosure may relate to concerns such as:

- Unsafe, abusive or neglectful care.
- Breaches of residents' or clients' rights
- Failure to meet the Aged Care Quality Standards.
- Inappropriate restraint or treatment.
- Theft, financial exploitation or coercion.
- Serious misconduct by CHI or people acting on its behalf.

How to make a disclosure

Disclosures can be made verbally or in writing and may be anonymous. A disclosure can be made to:

- the Whistleblower Officer (currently, Vicky Moriarty, Chief People Officer, vicky.moriarty@catholichomes.com or telephone 08 6454 1719); or
- a Responsible Person or senior leader; or
- the Chief Executive Officer (CEO); or
- an external body authorised under the Aged Care Act or Corporations Act.

Reports may also be made externally to an independent third party, rather than through internal channels if preferred. Catholic Homes has engaged Grant Thornton to provide this independent service. Reports can be made to Grant Thornton by post, email or telephone:

1. Confidential email: catholichomes@myvault.net.au
2. Confidential Toll free: 1300 550 471
3. Confidential Postal address:
   Catholic Homes
   C/- Risk Consulting- Whistleblower service
   GPO Box 4736
   Melbourne VIC 3001

People are encouraged to provide as much information as they can, such as what happened, who was involved, and when and where it occurred. Evidence is helpful but not required.

Reporting concerns about the CEO
If a disclosure relates to the CEO, the report should be made directly to the Board Chairman in writing via email on whistleblower@catholichomes.com. Reports about senior leaders will be handled with heightened independence and confidentiality. Where appropriate, the Board (or a delegated independent committee) will oversee the response and investigation to ensure there is no conflict of interest and that the matter is managed fairly, objectively and in accordance with this policy and relevant legislation.

What happens next
CHI will:
- Assess the disclosure to determine whether it qualifies for legal protection.
- Decide whether immediate action is required to protect people from harm.
- Investigate the matter fairly and independently where appropriate.
- Take corrective action if wrongdoing is substantiated.

Where possible, the whistleblower will be kept informed about progress and outcomes.

Confidentiality and protection
CHI will protect whistleblowers by:
- Keeping identities confidential unless disclosure is required by law or consent is given.
- Limiting access to information to those who need to know.
- Allowing anonymous reporting.
- Actively preventing retaliation or victimisation.

Any retaliation against a whistleblower may result in disciplinary or other action.

Roles and Responsibilities

Role	Responsibility
Board	• Approves and oversees this policy • Promotes a culture of safety and ethical behaviour • Reviews serious disclosures (deidentified) and makes sure action is taken • Receive reports on disclosures (deidentified) and monitors patterns or any systemic issues • Ensures independent investigations happen if senior employees or Responsible Persons are involved • Makes sure no one is punished for speaking up
CEO	• Leads CHI in supporting this policy • Appoints and supports the Whistleblower Officer • Refers serious disclosures (deidentified) to the Board or external bodies if needed • Acts on investigation findings and ensures fair outcomes • Reports to the Board about how the policy is working • Acts appropriately with respect to any disclosures made directly to them
Whistleblower Officer	• Is the main contact for whistleblower reports • Keeps identities and information confidential • Checks if a report qualifies for protection • Investigates or arranges an independent investigation of Protected Disclosures • Reports to regulators or police if required • Keeps the whistleblower informed • Puts protections in place to prevent retaliation • Records and stores all reports securely • Advises the CEO and Board on patterns or risks

Internal Supporting Documents

Internal Related Documents
Code of Conduct
Complaints and Feedback Policy
Incident Management Policy
Open Disclosure Policy
Whistleblower Policy – Workforce

External Resources, Standards and Legislation

External resources, standards and legislation
Section 547 to 553, Aged Care Act 2024 (Cth)
Part 9.4AAA, Corporations Act 2001 (Cth)