

# Whistleblower Policy - Workforce

## Policy Statement

Catholic Homes Incorporated (CHI) is committed to creating a safe, ethical and respectful workplace where people feel confident to speak up if something is not right.

Speaking up helps CHI protect the people we care for, meet our legal obligations, and continuously improve the quality and safety of our services. CHI encourages reporting of serious concerns about misconduct, unsafe or poor-quality care, illegal activity or unethical behaviour.

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 people who speak up about serious concerns.
- Keeps identities confidential and allows anonymous reporting.
- Decides whether legal whistleblower protections apply.
- 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 people who are part of CHI's workforce, including:

- Current and former Employees (including volunteers and students).
- Responsible Persons.
- Contractors, Associated Providers and their workers.
- Family members or associates of the above.

This policy covers disclosures about serious issues such as:

- Quality or safety of care.
- Misconduct, negligence or abuse.
- Breaches of law or regulatory obligations.
- Fraud, corruption or misuse of resources.
- Unethical behaviour connected to CHI.

Clients, residents, families and advocates are covered under CHI's Whistleblower Policy – Residents and Clients.

## Definitions

| Term                 | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Client / Resident    | An individual receiving services from CHI, encompassing Home Care, Residential Aged Care, and Independent Living.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Contractors          | An individual or organisation that completes work for CHI (including but not limited to Associated Providers and their employees) and is not classified as an Employee                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Employees            | All individuals employed by CHI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Protected Disclosure | A disclosure that qualifies for protection under the Aged Care Act and/or Corporations Act when it relates to: <ul style="list-style-type: none"> <li>• information that indicates a possible contravention of the Aged Care Act, or</li> <li>• is made by a Whistleblower (such as an employee, contractor, student, volunteer, resident or client, or their family member, friend, advocate, guardian or other person registered as a supporter in accordance with the Aged Care Act 2024).), and</li> <li>• is made to the Whistleblower Officer, a Responsible Person, or an authorised external body.</li> </ul> |

| Term                    | Definition                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         | 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: <ul style="list-style-type: none"> <li>• responsible for Executive decisions at CHI; or</li> <li>• responsible for planning, directing or controlling the activities of CHI; or</li> <li>• responsible for overall management of CHI nursing services; or</li> </ul> responsible for the day-to-day operations of a CHI residential care home or home care service delivery. |
| Students and Volunteers | Any individual engaged by CHI on a student placement or on a voluntary basis.                                                                                                                                                                                                                                                                                                                         |
| 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 treated with dignity and listened to respectfully.
- **Confidentiality and anonymity:** identities will be protected and anonymous disclosures are accepted.
- **No retaliation:** CHI does not tolerate victimisation, retaliation or disadvantage for raising concerns in good faith.
- **Accessibility and support:** CHI makes it easy to report concerns and provides support throughout the process.
- **Continuous improvement:** Disclosures help CHI learn, address risks and improve care and services.

### What can be reported

A disclosure may relate to concerns such as:

- Unsafe, abusive or neglectful care.
- Breaches of the Aged Care Act, Quality Standards or Code of Conduct
- Fraud, theft or financial misconduct.
- Corruption or conflicts of interest.
- Serious breaches of CHI policies.
- Behaviour that places people, CHI or the community at risk.

Personal employment grievances (such as disputes about rosters, pay or performance) are generally not whistleblower matters unless they also involve serious misconduct or retaliation for speaking up.

### 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](mailto: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](mailto: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](mailto: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 on a need-to-know basis.
- Allowing anonymous reporting.
- Actively preventing retaliation or victimisation.

Any person who engages in retaliation may face disciplinary action, up to and including termination of employment or engagement.

### Roles and Responsibilities

| Role  | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board | <ul style="list-style-type: none"> <li>• Approves and oversees this policy</li> <li>• Promotes a culture of safety and ethical behaviour</li> <li>• Reviews serious disclosures (deidentified) and makes sure action is taken</li> <li>• Receive reports on disclosures (deidentified) and monitors patterns or any systemic issues</li> <li>• Ensures independent investigations happen if senior Employees, Contractors or Responsible Persons are involved</li> <li>• Makes sure no one is punished for speaking up</li> </ul> |
| CEO   | <ul style="list-style-type: none"> <li>• Leads CHI in supporting this policy</li> <li>• Appoints and supports the Whistleblower Officer</li> <li>• Refers serious disclosures (deidentified) to the Board or external bodies if needed</li> <li>• Acts on investigation findings and ensures fair outcomes</li> </ul>                                                                                                                                                                                                             |

| Role                    | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         | <ul style="list-style-type: none"> <li>• Makes sure Employees, Contractors and Responsible Persons are trained to understand and follow the policy</li> <li>• Reviews training records and ensures that Employees and Responsible Persons are trained to understand their obligations under this policy</li> <li>• Reports to the Board about how the policy is working</li> <li>• Acts appropriately with respect to any disclosures made directly to them</li> </ul>                                                                                                                                                                                                                                                |
| Whistleblower Officer   | <ul style="list-style-type: none"> <li>• Is the main contact for whistleblower reports</li> <li>• Keeps identities and information confidential</li> <li>• Checks if a report qualifies for protection</li> <li>• Investigates or arranges an independent investigation of Protected Disclosures</li> <li>• Reports to regulators or police if required</li> <li>• Keeps the whistleblower informed</li> <li>• Puts protections in place to prevent retaliation</li> <li>• Records and stores all reports securely</li> <li>• Advises the CEO and Board on patterns or risks</li> <li>• Circulates communications frequently to remind Employees, Contractors and Responsible Persons of their obligations</li> </ul> |
| Managers                | <ul style="list-style-type: none"> <li>• Take concerns seriously and pass them on to the right person</li> <li>• Keep information confidential</li> <li>• Watch for and stop any retaliation</li> <li>• Supports Employees, Contractors and Responsible Persons during investigations</li> <li>• Ensures Employees and Contractors know how to report concerns under the correct policy</li> <li>• Help create a safe and open culture</li> </ul>                                                                                                                                                                                                                                                                     |
| Employees & Contractors | <ul style="list-style-type: none"> <li>• Know how to report concerns under the correct policy and support disclosures by Clients / Residents under this policy</li> <li>• Speak up if they see something wrong</li> <li>• Keep information private</li> <li>• Never retaliate against someone who reports a concern</li> <li>• Cooperate with investigations</li> <li>• Complete training about whistleblower protections</li> </ul>                                                                                                                                                                                                                                                                                  |

## Internal Supporting Documents

| Internal Related Documents                   |
|----------------------------------------------|
| Code of Conduct                              |
| Complaints and Feedback Policy               |
| Incident Management Policy                   |
| Open Disclosure Policy                       |
| Whistleblower Policy – Residents and Clients |

## 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)      |