



WHISTLEBLOWER POLICY AND PROCEDURE

Policy Title: Whistleblower Policy	Doc No.: CORP-PLY66	Version: Draft 1.0
Category: Corporate/HR	Owner: Management Committee	Authoriser: 26/03/2026

1 PURPOSE

The purpose of this policy is to:

- Encourage individuals to feel safe in expressing concerns and report matters of concern
- Provide information to assist individuals to report a matter of concern and provide clear, confidential, accessible and safe mechanisms for people to report concerns in good faith
- Outline the process and protections for whistleblowers disclosing suspected wrongdoing
- Define safeguards for whistleblowers against reprisal by any person as a result of making a disclosure, and in protecting an individual's identity
- Foster a culture of transparency, accountability and ethical governance, and
- Ensure Ravenshoe Community Centre Inc maintains the highest standards of ethical behaviour and integrity and to contribute to continuous improvement.

2 TERMS AND DEFINITIONS

Term	Definition
Whistleblower (Aged Care)	An individual who reports misconduct, unethical practices, breaches of aged care legislation, or risks that may harm individuals or the organisation.
Eligible Discloser	A whistleblower who is related to the organisation, including: <ul style="list-style-type: none"> • A Responsible Person of the organisation • A worker, including contractors, volunteers and workers of Associated Providers • A current or former client receiving services from the organization • A supporter or guardian of a current or former client receiving services from the organisation.
Eligible Recipient	An individual or organisation who can receive a whistleblower disclosure: <ul style="list-style-type: none"> • The Aged Care Commissioner or a staff member of the Commission • The Department, or an official of the Department • A registered provider of Aged Care (us or another provider) • A responsible person of a registered provider • A Police Officer • An independent Aged Care Advocate • An appointed Whistleblower/Investigation Officer within RCC Inc • The Uniting Care Integrity Hotline See Appendix 1 (page 6)
Eligible disclosures qualifying for protection	Disclosures must relate to breaches or misconduct in the provision of Aged Care, and there must be reasonable grounds to suspect that a breach or misconduct has occurred. Disclosures qualify for whistleblower protections if: <ul style="list-style-type: none"> • They are made to any eligible recipients listed above

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	<ul style="list-style-type: none"> The disclosure is made orally or in writing (including anonymously); and <p>The discloser reasonably suspects that an entity may have breached the Aged Care Act 2024.</p>
Examples of eligible disclosures	Unlawful, unethical or unacceptable behaviour, including fraud, theft, abuse, negligence, regulatory breaches, corruption, unethical practices, criminal behaviour, unreported serious incidents, and unmitigated serious risk.
Confidential Disclosure	All reports made by a whistleblower are protected against unauthorized disclosure.
Whistleblower/ Investigation Officer or Team	A designated person/group within RCC Inc. is responsible for reviewing and acting upon eligible whistleblower disclosures.
Whistleblower Protection	Safeguards ensuring disclosers are protected from retaliation, discrimination or victimization after reporting misconduct.
RCC Inc.	Ravenshoe Community Centre Incorporated.

3 SCOPE

This policy applies to:

- All employees, contractors, volunteers, Associated Providers and workplace participants within the organisation
- Clients, their supporters, families and representatives who wish to report serious concerns about services, staff behaviour, or organisational practices
- Governance and leadership teams responsible for oversight, investigation, and resolution of whistleblower disclosures
- Any person or organisation (listed in the Definitions section) who has received an eligible disclosure.

4 POLICY

Ravenshoe Community Centre Inc. recognises that we live in a diverse society and values that diversity.

Ravenshoe Community Centre Inc (and Rural and Remote Home Care Service – R&RHCS) is committed to fostering a culture of integrity and accountability, where people observe high standards of good governance and ethical behaviour and feel supported to disclose matters of concern.

4.1 RAVENSHOE COMMUNITY CENTRE WILL:

- Recognizes that the people who have a work, service or client relationship with RCC Inc or R&RHCS are often the first to realise there may be something wrong.
- This policy encourages and supports individuals to disclose concerns of suspected wrongdoing including any unethical, illegal, fraudulent or undesirable conduct involving Ravenshoe Community Centre Inc and is committed to protecting the health and safety, dignity and reputation of those persons who make a disclosure.

4.2 RESPONSIBILITIES

For Employees, Volunteers, Contractors and Associated Providers:

- Report concerns promptly when any misconduct, risks or breaches are identified

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- Report whistleblower disclosures raised by clients and their representatives
- Participate fully in investigations in a professional and fair manner
- Maintain the confidentiality of disclosers and the information disclosed throughout the whistleblower process.

For Governance Teams:

- Oversee whistleblower frameworks to ensure compliance with the Aged Care Act 2024
- Ensure all eligible disclosers are aware of their rights to make whistleblower disclosures, and the protections they are entitled to
- Provide accessible channels for all members of the workforce, clients, supporters, guardians, representatives and others, to make confidential disclosures as whistleblowers, which are separate from the feedback and complaints system
- Provide protections for whistleblowers, including anti-retaliation practices
- Ensure fair and transparent investigations are conducted, and
- Ensure outcomes from whistleblower disclosures and their investigation result in continuous quality improvement.

NOTE: This Policy does not provide for immunity to be granted to a person ‘blowing the whistle’ when they are involved in a wrongdoing or improper conduct themselves. The person’s liability for their own conduct is not mitigated by the same person’s disclosure of this conduct and RCC Inc cannot provide protections for the person from external prosecution.

5 PROCEDURE

Ravenshoe Community Centre Inc. recognises that we live in a diverse society and values that diversity.

Ravenshoe Community Centre Inc (and Rural and Remote Home Care Service – R&RHCS) is committed to fostering a culture of integrity and accountability, where people observe high standards of good governance and ethical behaviour and feel supported to disclose matters of concern.

5.1 DISCLOSURE PROCESS

What Can be Disclosed:

Whistleblowers are encouraged to report issues such as:

- Breaches of legal, regulatory or organisational obligations
- Fraud, corruption or financial misconduct
- Harassment, discrimination or bullying
- Risks to the safety, well-being, or rights of clients, workers, children (where applicable) or other vulnerable individuals, and
- Other unethical or improper conduct within the organisation.

5.2 DISCLOSURE PROCESS – HOW TO MAKE A DISCLOSURE

Whistleblowers can report concerns through anonymous or confidential channels including:

- Dedicated whistleblower phone lines and email accounts (see Appendix 1)
- Written submission or in-person disclosure to the organisations Whistleblower/Investigation Officer or team, or
- To any organisation or person listed as an ‘eligible recipient’ on page 1.

Where a disclosure has been received by an eligible recipient external to our organisation, the Whistleblower/Investigation Officer or team will receive and document the disclosure from that recipient.

If a discloser wishes to have the disclosure managed as a complaint or feedback only, then the issue will be handled in accordance with the organisation's feedback and complaints procedure where this does not contravene any obligations related to the Aged Care Act 2024 or reporting to the Commission under the Serious Incident Response Scheme (SIRS).

Where a complaint that appears to meet the criteria for an eligible disclosure has been submitted through the organisation's feedback and complaints system, it will be removed and transferred to the whistleblower management system.

5.3 DISCLOSURE PROCESS – DOCUMENTING THE DISCLOSURE

Documentation will include details such as what occurred, when and where it occurred, names of individuals allegedly involved, any previous steps taken to raise and resolve concerns, and any supporting evidence available.

5.4 DISCLOSURE PROCESS – CONFIDENTIALITY AND PROTECTION

Confidentiality Measures

- All members of the workforce, and responsible persons, are educated in regard to their roles and responsibilities as eligible recipients of whistleblower disclosures
- All disclosures will be treated confidentially, with identifying information restricted to investigation teams only
- Anonymous reporting options are provided – whistleblower identities will only be revealed with consent, or where consent is not required, such as where reporting is required under SIRS.

Protection Mechanisms

- Anti-retaliation measures will safeguard whistleblowers against adverse treatment, discrimination, dismissal or workplace victimization
- Any breach of whistleblower protection protocols will lead to disciplinary action against offenders
- The whistleblower/investigation officer or team will proactively confirm with whistleblowers on a regular basis that they are not being subjected to any adverse treatment, and that they feel safe and supported.

5.5 DISCLOSURE PROCESS – INVESTIGATION

Investigation Process

- Confirm the receipt of the disclosure as soon as possible, within 7 business days at most
- Assign the whistleblower team to handle the disclosure process
- Conduct investigations impartially, adhering to guidelines set out by relevant legislation and industry standards
- Advise any member/s of the organisation who may be a subject of a disclosure, if procedural fairness is required, and
- Document all evidence collected during the investigation to ensure transparency and resolution.

Outcomes

- Provide the whistleblower with updates on the investigation's progress and resolution (where contact details are voluntarily provided)

- Prepare a written report, setting out the findings of the investigation and any remedial steps to be taken
- Undertake any further reporting actions that may arise from the disclosure and findings, such as reporting in accordance with the Serious Incident Response Scheme (SIRS), Australian Health Practitioner Regulation Agency (AHPRA), Australian Securities and Investment Commission (ASIC) etc.
- Implement corrective actions and governance reforms based on investigative findings, and
- Document actions required in the Continuous Quality Improvement Plan, where doing so will not breach the confidentiality of disclosers, or those who are the subject of the disclosure.

5.6 DISCLOSURE PROCESS – REPORTING

Governance Oversight

- Ensure governance structures review whistleblower reports and implement systemic improvements, and
- Submit periodic whistleblower activity summaries as a part of ongoing governance meetings

Aged Care Quality Standards Compliance

- Incorporate findings to resolve breaches or risks that impact ACQS outcomes, ensuring alignment with the strengthened standards.

5.7 DISCLOSURE PROCESS – RECORD KEEPING

- Detailed records of all disclosures, investigations and outcomes are maintained securely and confidentially, and
- These records will be retained for a minimum duration of 7 years or where a child/ren are involved for the duration required under the relevant legislation.

5.8 AWARENESS, TRAINING AND DEVELOPMENT

RCC Inc will:

1. Staff and Contractor Training:

- Provide training at induction, and annually, on whistleblower rights, responsibilities and reporting procedures
- Educate staff on ethical practices, governance expectations, and the consequences of misconduct retaliation, and
- Include whistleblower reporting details in contractor agreements.

2. Client-Focused Resources:

- Develop resources (e.g. brochures or digital guides) to help clients understand how to report concerns safely, and/or
- Include information about whistleblower disclosures and protections in information provided to clients, including handbooks and service agreements.

3. Encouraging Whistleblower Disclosures:

- Ensure all members of the organisation, contractors, clients, supporters, guardians and representatives, feel encouraged and welcomed to raise concerns without reprisal
- Issue quarterly reminders to all members of the workforce at staff meetings and through other regular communications about how to report serious issues, and whistleblower protection entitlements, and

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- Issue quarterly reminders to clients (via a statement included with client invoices) about how to report serious issues, and whistleblower protection entitlements.

5.9 MONITORING AND EVALUATION

RCC Inc will:

- Track whistleblower reports by monitoring whistleblower disclosures via internal tracking mechanisms identifying trends or systemic risks
- Undertake regular periodic audits to ensure whistleblower processes comply with the Aged Care Quality Standards and legislative obligations, and
- Evaluate whistleblower protections via actively soliciting feedback from whistleblowers to assess transparency, accessibility and the effectiveness of protection mechanisms.

5.10 RELEVANT LEGISLATION AND STANDARDS

This policy adheres to:

- Aged Care Quality Standards (ACQS) – ensuring safe and transparent governance systems that address concerns impacting care quality or compliance
- Aged Care Act (2024) – Sections 165-40 to 165-60 maintaining a compliant whistleblower system and whistleblower policy, and
- Privacy Act (1988) – protecting the confidentiality of whistleblower disclosures.

5.11 REVIEW OF POLICY

This policy will be reviewed annually or sooner, if:

- Legislative or ACQS Standards change, requiring updates to whistleblower frameworks
- Audit findings indicate non-compliance or gaps in privacy and confidentiality mechanisms
- Feedback from whistleblowers, employees or stakeholders suggests refinements to whistleblower processes, and
- Where requirements for whistleblower protections and confidentiality have been breached.

5.12 APPENDIX 1

ELIGIBLE RECIPIENTS FOR RECEIVING DISCLOSURES – RCC INC

Whistleblower Officers:

secretary@ravcom.org.au

ELIGIBLE RECIPIENTS FOR RECEIVING DISCLOSURES – EXTERNAL

Aged Care Quality & Safety Commission
Complaints & concerns 1800 951 822

Older Persons Advocacy Network
 1800 700 600 Aged Care Advocacy Line 8am – 8pm Mon – Fri | 10am – 4pm Sat

Uniting Care Integrity Hotline – operated by Stopleveline
 1300 304 550 unitingcareqld@stopleveline.com.au

6 ADHERENCE

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All workers are required to adhere to this procedure and any related policies and documents. Failure to adhere to this procedure may result in disciplinary action in accordance with relevant policies and procedures.

7 MANAGEMENT APPROVAL

Authorised by: Management Committee	Signed: Priscilla Clare
Date: 26-Mar-26	

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