

## Whistleblower Policy

### Policy

This policy applies to disclosures made about breaches of Aged Care legislation, and is relevant to all Responsible Persons, staff, participants, and their supporters and families.

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 Complaints, Compliments and Feedback Policy.

Where a person wishes to make a report as a whistleblower, the processes outlined in this policy will be followed.

Our processes ensure that eligible people – a person is related to Stable Home Care, such as a Responsible Person, staff member, care worker, a participant, supporter, or substitute decision-maker - wishing to make a disclosure about breaches of aged care legislation have access to do so safely, anonymously if they want to, and with the full protection of the law, without fear of victimisation or discrimination. Stable Home Care's preferred method for making whistleblower disclosures is via its independently managed external whistleblowing service, Your Call, as outlined in Section 4 of this policy.

### Disclosures

Disclosures must relate to breaches or misconduct in Stable Home Care's provision of aged care. There must also be reasonable grounds to suspect that a breach or misconduct has occurred, including witnessing such acts. Disclosures eligible which render the discloser eligible for whistleblower protections include:

- Conduct that is unethical or dishonest
- Fraud, theft, or financial mismanagement
- Corruption or undeclared conflicts of interest
- Organisational mismanagement
- Systemic bullying, harassment or discrimination of the workforce
- Criminal acts
- Serious risks to the safety of participants or care workers that have not been managed

A disclosure can be made to any of the following eligible recipients:

- The Commissioner or a staff member of the Commission
- The Department, or an official of the Department
- A registered provider (us or another provider)
- A Responsible Person of a registered provider
- An aged care worker of a registered provider (including care workers of associated providers)
- Police officer
- An independent aged care advocate

## Encouraging whistleblower disclosures

Stable Home Care's processes ensure that participants, their supporters and families, and staff of Stable Home Care have access to channels through which they can make whistleblower disclosures and are fully informed of their rights to whistleblower protections.

Participants, supporters and families are informed in the following ways:

- Through the Participant Handbook and Welcome Pack
- Through the Support at Home Service Agreement
- Information hosted on our website
- Monthly reminders about our Whistleblower Policy by email
- Through our regular newsletters

As all staff of Stable Home Care, including Responsible Persons, Care Workers and Associated Providers are both eligible recipients of whistleblower disclosures, and eligible to make disclosures themselves, it is imperative that they are aware of the responsibilities of this dual role. Stable Home Care meets this responsibility by:

- Explaining whistleblower information receipt and protection protocols at induction.
- Providing training at induction and annually
- Including information in Staff and Associated Provider Handbooks
- Monthly reminders via email
- Reminders at Staff Meetings and through staff newsletters

## Making a Whistleblower Disclosure

Whistleblower disclosures are managed through systems and processes separate to the Complaints, Compliments and Feedback system to ensure the confidentiality of the discloser, the information they provide, and any details about other people allegedly involved are maintained at all times.

Stable Home Care encourages whistleblower disclosures to be made via its independently managed external whistleblowing service, Your Call, as the preferred reporting method.

Your Call provides a secure and confidential channel for disclosures, supports anonymous reporting, allows secure document uploads, and enables ongoing communication while protecting the identity of the discloser.

Disclosures made via Your Call are managed in accordance with this policy and applicable legislation.

### External Reporting Process

You may make a report using Stable Home Care's external whistleblowing service which is independently managed by Your Call.

How reports made via Your Call are handled

You can make a report to Your Call:

Online 24/7	<a href="http://www.yourcall.com.au/stablehomecare">www.yourcall.com.au/stablehomecare</a>
Telephone 7am – midnight AEST, Business Days	1300 790 228 AU

You can:

make your report anonymously or consent to sharing your identity

securely upload any relevant documentation or material that you wish to provide

remain in contact with Stable Home Care and receive updates about the handling of your report via Your Call's online message board, which you will have access to after



Stable Home Care

P: 1300 857066

E: [care@stablehomecare.com.au](mailto:care@stablehomecare.com.au)

W: [www.stablehomecare.com.au](http://www.stablehomecare.com.au)

With your consent, your report will be provided to Stable Home Care's nominated whistleblower officers so that it can be managed in accordance with this policy. If you choose to remain anonymous, your identity will not be provided by Your Call to Stable Home Care without your consent. Your Call will not investigate your report.

Stable Home Care's nominated whistleblower officers are:

Quality and Compliance Officer

Operations Manager - Amy Bacon

Managing Director - Joshua Bacon

### **National Relay Service**

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service at <https://www.accesshub.gov.au> and requesting Your Call's hotline 1300 790 228.

If you have difficulty speaking or understanding English, Your Call can be contacted through the Translating and Interpreting Service (TIS) 131 450 and asking for Your Call on 1300 790 228.

### **Other Reporting Agencies**

If you prefer, you can also contact:

Aged Care Quality and Safety Commission – 1800 951 822

Australian Securities & Investments Commission (ASIC) – if your concern relates to corporate misconduct

Australian Federal Police (AFP) – for serious offences

These channels for making disclosures are included in key information provided to participants and staff and are displayed on our website.

## Receiving a Whistleblower Disclosure

Persons within Stable Home Care who receive a whistleblower disclosure will attempt to obtain as much information as possible to support an investigation, including:

- A description of the events or activities, including locations
- The names of the people involved and their roles
- Relevant dates and times
- Possible witnesses to the events
- Any supporting documentary evidence of the events
- Any other steps taken to raise and resolve concerns

The person receiving the disclosure will:

- Assure the discloser that their anonymity will be maintained and seek permission for their name to be disclosed to the Whistleblower Protection Officer (if applicable) so that communication with the discloser can be maintained.
- Remind the discloser that they are eligible for whistleblower protections and direct them to the information that supports this.
- Contact the Whistleblower Protection Officer (if applicable) and relay all information obtained by the discloser.
- Maintain confidentiality about the discloser and the information they have provided.
- Seek support through the Employee Assistance Program if receiving the disclosure, or the details of the disclosure, has caused distress or concern.

Where a disclosure has been made to someone external to the organisation, such as the Aged Care Quality and Safety Commission, the Department of Health, Disability and Ageing, a police officer, or an advocate, or a contracted whistleblower agency (where applicable), they will be put in contact with the Whistleblower Protection Officer to handover the information they have received.

## Investigating the Disclosure

The Whistleblower Protection Officer will:

- Acknowledge receipt within five business days, unless the disclosure has been made anonymously.
- Report the disclosure to the most senior Responsible Person in our organisation, unless they are the subject of the disclosure.
- Conduct a confidential and impartial investigation.
- Engage legal advice if required.
- Any member of the organisation who may be the subject of a disclosure will be advised about the matter if procedural fairness is required and will be supported in accessing the Employee Assistance Program or recommended to seek legal advice if needed.
- Unless the Whistleblower is anonymous, the Whistleblower Protection Officer will maintain communication with the whistleblower throughout the process, including when the investigation is finalised, and continuously confirm with the whistleblower that they feel safe, and have not been subjected to any victimisation or other adverse treatment.

## Resolving and Actioning the Disclosure

Resolution and corrective actions associated with a disclosure follow the same processes as those for incident and complaints management, with the exception of the higher level of confidentiality that is to be maintained throughout the process, and the potential outcomes of serious misconduct impacting the organisation.

Findings from the investigation and any actions to be taken are managed in the following ways:

- Thoroughly documented and maintained in a secure location
- Records relating to the disclosure, investigations, and outcomes are maintained for seven years.
- Findings and outcomes are reported back to the whistleblower (unless they have remained anonymous)
- A written report is prepared, which sets out the findings of the investigation and any remedial steps to be taken.
- This report is provided to the most senior Responsible Person, unless they are the subject of the disclosure.
- Further reporting actions are taken where applicable, for example, reporting an issue in accordance with the Serious Incident Response Scheme, or reporting misconduct to a professional registration body.

- Any relevant findings are incorporated into the Continuous Improvement System.

## Whistleblower Support and Protection

Whistleblowers are protected from victimisation and other detrimental action, such as:

- Any action causing harm, including psychological harm
- Damage to a person's property or reputation
- Intimidation, bullying or harassment
- Discrimination
- Adverse treatment now or in the future

Stable Home Care maintains a zero-tolerance approach to the victimisation of whistleblowers.

Any member of Stable Home Care's governing body, management, or workforce found to have victimised a whistleblower will be subject to disciplinary action, which may result in the termination of their employment or engagement, or prosecution under the Aged Care Act 2024.

The Whistleblower Protection Officer will ensure that any staff member who has made a disclosure is encouraged to access the Employee Assistance Program for support. They will also continuously check on any participant, supporter, or staff member who has made a disclosure to ensure that they feel safe and supported.

## Applicable Aged Care Standards

- Standard 2 - The Organisation:
  - Outcome 2.3 Accountability, quality system and policies and procedures
  - Outcome 2.6a Complaints and feedback management for aged care workers
  - Outcome 2.6b Complaints and feedback management for individuals.