Whistleblower Policy

Essential Information

What is a whistleblower disclosure?	A special form of disclosure that is recognised by the law and entitled to special protections. Whistleblower disclosures are used to report actual or reasonably suspected wrongdoing in relation to **St Andrew's.**
What is "wrongdoing"?	Misconduct, a reportable incident (as defined under the Serious Incident Response Scheme (SIRS)), a breach of any of the provisions of the Aged Care Act 2024 (Cth) or an improper state of affairs with respect to **St Andrew's.**
When to blow the whistle	Whistleblower protections apply in specific circumstances under the law. If you are unsure whether your disclosure qualifies, you are encouraged to make a report so it can be assessed. Generally, whistleblowing may be an option if: • you have reasonable grounds to suspect that an entity* may have contravened a provision of the Aged Care Act 2024 (Cth) or otherwise committed wrongdoing, and • your disclosure meets the eligibility requirements • You reasonably suspect a serious psychosocial risk or failure to provide a psychologically safe workplace, where other reporting pathways are not appropriate or safe. If whistleblowing is not the best option for you, you may be able to use other reporting procedures such as our Feedback and Complaints or Incident Management procedures. *An "entity" means an individual, body corporate, body politic, partnership or any other unincorporated association that has a governing body.
Why blow the whistle?	So that we can investigate and address any wrongdoing and prevent further impacts.
Who this policy applies to	This policy covers all people who interact with St Andrew's, including: •employees (permanent, part-time, casual, fixed term and agency staff): •contractors, consultants and suppliers of goods and services; •volunteers, students and governing body members; and •service users, their supporters, representatives, family members, carers and independent advocates.
Specific responsibilities	The Board will oversee the Whistleblower Program and receive de-identified quarterly reports on disclosures, investigations, and outcomes.
How to report	If you wish to make your whistleblower disclosure to us, contact our **Whistleblower Protection Officer v**ia the contact@standrew.com.au email account. Disclosures made to other staff may not attract whistleblower protections unless they are referred appropriately.

	If you wish to make your whistleblower disclosure directly to an external agency such as the Aged Care Quality and Safety Commissioner (1800 951 822) or Australian Securities and Investments Commission (ASIC) this will be a matter for you to arrange with that agency.
What we will do	We will assess your disclosure for appropriate action, including: • Conducting a risk assessment considering the identified psychosocial hazard • commencing an investigation • protecting your identity • protecting you from detriment – although our ability to do this will be greater for current employees than for whistleblowers outside the organisation. Your report will be taken seriously, and we will strive to ensure that you are protected and supported. You may be entitled to legal protections under the Aged Care Act 2024 (Cth) and/or Corporations Act 2001 (Cth), as detailed in this Policy. St Andrew's strictly prohibits retaliation, reprisal or detriment against a person who makes a whistleblower disclosure. Any such conduct will be treated as serious misconduct.
Can a report be anonymous?	You may remain anonymous or provide your name — the choice is yours. However, if you provide your identity, this will help us to oversee your wellbeing. It may limit our ability to conduct a thorough investigation if we are not able to contact you to obtain further information about the wrongdoing you have disclosed.
What to do if you are considering making a report	• Read this Policy. • Determine if blowing the whistle is the best option for you. • If whistleblowing is the best option, follow the instructions under How to Make a Whistleblower Disclosure.
Who to speak to about this policy or to obtain additional information before making a disclosure	Speak to our Whistleblower Protection Officer.
Record Keeping	Records relating to whistleblower disclosures and investigations will be retained in accordance with St Andrew's Record Management Policy, the Privacy Act 1988 (Cth), and any applicable data protection requirements.
Organisation policies	This Policy should be read in conjunction with St Andrew's Code of Conduct, Incident Management Procedure, Feedback and Complaints Policy, and Grievance Resolution Procedure.
Forms, record keeping, other documents	Records relating to whistleblower disclosures and investigations will be retained in accordance with St Andrew's Record Management Policy, the Privacy Act 1988 (Cth), and any applicable data protection requirements.

Legislation	• The *Aged Care Act 2024* Sections 547-554 • The *Aged Care Rules 2025* Sections 165-40, 165-45, 165-50, 165-55 and 165-60 • Corporations Act 2001 (Cth) • Privacy Act 1988 (Cth)
Definitions	**Anonymity**: is when one's identity is unknown. In the case of an anonymous Whistleblower, their identity is not disclosed and may not be known to those receiving or investigating the disclosure. **Confidentiality:** is when one's identity is protected to prevent harm. In the case of a Whistleblower, their identity may be known to those receiving and investigating the Qualifying Disclosure, but their identity is protected from the broader organisation and public. **Discloser (or Whistleblower):** Any person who makes a Qualifying Disclosure about a suspected contravention or misconduct in the provision of aged care. **Detriment**: Any disadvantage, harm or adverse treatment including dismissal, demotion, discrimination, harassment, intimidation, injury, property damage, reputational harm, or threats of these. **Employee Assistance Program (EAP**): a work-based support program that offers employees confidential, anonymous reporting and free counselling for personal or work-related problems. **Qualifying Disclosure**: A disclosure of information by a person which: is made to one of the people or entities set out in Section 547 of the Act; is made either orally or in writing, and either anonymously or not; and the Discloser has reasonable grounds to suspect indicates that an entity may have contravened the Act. **Responsible person**: Member of the governing body or any person in a role designated as a responsible person by the organisation. **Whistleblower Protection Officer (WPO**): A designated senior role responsible for implementing this Policy, receiving and triaging disclosures, safeguarding disclosers, coordinating investigations and system improvements.