

Policy

Whistleblower Policy

Purpose and rationale

Wesley Mission Queensland Limited (WMQ) is committed to a positive, supportive and accountable culture for our workforce, customers and other stakeholders. This includes establishing a culture and system to encourage anyone to report Suspected Wrongdoing within or by WMQ.

Therefore, the purpose of this Policy is to:

- encourage reporting of Suspected Wrongdoing
- describe WMQ's Suspected Wrongdoing reporting processes including roles and responsibilities
- outline the supports and safeguards available to individual/s reporting Suspected Wrongdoing at WMQ.

Position statement

WMQ encourages and facilitates reporting of Suspected Wrongdoing within or by WMQ. WMQ is committed to investigating all reports of Suspected Wrongdoing thoroughly and impartially and taking appropriate action, up to and including disciplinary action where wrongdoing is confirmed.

WMQ is committed to protecting individuals who make such reports from retaliation and detriment. WMQ is also committed to using the insights gained from reports and investigations to guide continuous improvement activities, where indicated.

Scope

This Policy applies to reports assessed as a Whistleblower Disclosure and the individuals who make a report of Suspected Wrongdoing. This includes reports made through all WMQ channels or our independent whistleblower hotline, STOPline.

This Policy does not:

- apply to employee grievances (e.g., workplace harassment, bullying, discrimination or general grievances) which are assessed as not being a Whistleblower Disclosure
- replace other existing reporting structures intended to respond to harm and/or immediate risk of harm (e.g., child protection)
- apply to general customer complaints.

All of the above scenarios are dealt with under other specific WMQ policies, procedures and/or frameworks.

However, if you believe an issue cannot be resolved using other existing mechanisms, or you consider the issue too sensitive, you may use this Policy to make a Report.

Expected outcomes

- Individuals will be more aware of the mechanisms available to report Suspected Wrongdoing.
- Individuals will feel safe and supported in reporting Suspected Wrongdoing.
- Individuals who make a Whistleblower Disclosure will be protected.
- Investigations under this Policy and accompanying procedure are conducted thoroughly and impartially.

Requirements

At WMQ, we:

- encourage you to report legitimate concerns of Suspected Wrongdoing
- provide you with safe ways to make a Report

Whistleblower Policy

- have processes that:
 - assess the nature of a Report and determine the appropriate response under the Policy
 - ensure thorough and impartial investigations are conducted, if required
 - resolve any issue(s) identified
 - ensure fair treatment of WMQ employees who are mentioned in (or related to) Reports
 - keep your identity confidential, to the extent permitted by law
 - protect and support you in making a Report.

Procedural framework

Making a Report

- Any individual can make a Report either verbally or in writing. In doing so, they can choose to be anonymous or identifiable.
- An individual may report Suspected Wrongdoing, even if they cannot identify the person/s related to the wrongdoing.
- An individual may make a Report about events that happened or may have happened before the *Whistleblower Policy* was in place.
- We will keep an identifiable Whistleblower informed about actions taken and outcomes of our investigation, unless:
 - giving that information would be impractical or a breach of an individual's privacy
 - it may negatively affect anyone's physical or psychological safety
 - there is an investigation of a criminal, civil and/or other possible offence.

Who can receive a Report?

- A Whistleblower Disclosure not related to the Aged Care Act must be reported to one of the following:
 - WMQ's Whistleblower Governance Officers (WGOs)
 - STOPline
 - an Eligible Recipient (including Directors or Officers) or
 - an External Prescribed Body.
- A Whistleblower Disclosure related to the Aged Care Act can be made to:
 - STOPline, which will be treated as a Whistleblower Disclosure to WMQ pursuant to the Aged Care Act
 - WGOs
 - an Aged Care Act Eligible Recipient (including Directors or Officers)
 - The Aged Care Quality and Safety Commission (ACQSC)
 - The Department of Health, Disability and Ageing (Department)
 - a police officer or
 - an independent aged care advocate (such as Older Persons Advocacy Network).

How will WMQ investigate a report of suspected wrongdoing

- Initially, Reports will be assessed to determine whether they meet the threshold of a Whistleblower Disclosure and/or are more appropriately dealt with through other frameworks, such as WMQ's Workplace Complaints Procedure, *Code of Conduct Policy*, *Customer Feedback Policy* and Procedure.

Whistleblower Policy

- Where the Report is assessed as a Whistleblower Disclosure, the Report will be investigated in accordance with this Policy and the *Whistleblower Procedure*.
- If the Report is assessed as not meeting the threshold of a Whistleblower Disclosure, it may be investigated in accordance with WMQ's other frameworks.
- Where an investigation into Suspected Wrongdoing is considered appropriate, this will be undertaken. This will occur as soon as practicable after a Report is made, by an appointed Investigations Officer (IO) in accordance with this Policy and the *Whistleblower Procedure*.
- Investigations will be conducted according to the rules of natural justice and will be carried out independently of the person(s) about whom a Report has been made.

Protections for Whistleblowers

- A Whistleblower who makes a Disclosure is protected under the provisions of the *Corporations Act 2001* (Cth), the *Aged Care Act 2024* (Cth) and other applicable legislation.
- This Policy does not prevent a Whistleblower from exercising their own legal rights and reporting Suspected Wrongdoing to other relevant authorities.

In dealing with a Report of Suspected Wrongdoing, WMQ will ensure the following supports and protections:

Anonymous reporting

While Reports can be made anonymously, this may pose significant limitations on the ability of WMQ to:

- complete a thorough investigation (due to WMQ's inability to request and receive additional information to assist the investigation); or
- provide any feedback on the outcome of the investigation.

Confidentiality

We hold information received through a Report in the strictest confidence. When a Whistleblower Disclosure contains information relating to the identity of the Whistleblower, we may only reveal that information if:

- we consult with the Whistleblower, and they agree in writing or
- we are authorised to do so by law.

We will take reasonable precautions to securely store any records that relate to a Report of Suspected Wrongdoing and only allow authorised employees or the IO to access relevant records.

Preventing retaliation or detrimental conduct

We will not tolerate any retaliatory action or detrimental conduct, including threats of such, against a Whistleblower or their family.

For example, a Whistleblower must not be disadvantaged or victimised for having made a Whistleblower Disclosure, including by:

- dismissal or termination of employment or supply of services
- injury to employment or position or duties altered to a disadvantage
- any form of unlawful discrimination, harassment or intimidation
- harm or injury, including psychological harm
- damage to personal property, reputation, financial or any other damage
- threats of any of the above.

If a Whistleblower believes such conduct has occurred, the Whistleblower should immediately report this to the Whistleblower Protection Officer (WPO).

Whistleblower Policy

Supporting individuals who are the subject of Reports

WMQ understands we must also support individuals against whom a Report is made during the Report's handling and investigation. WMQ takes reasonable steps to treat the person who is the subject of a Report fairly, particularly during the assessment and investigation process, in line with natural justice.

Training and communication

Training around Whistleblowing and disclosure processes is mandatory and will be provided for WMQ's workforce:

- upon commencement of employment or engagement
- annually for the duration of that employment or engagement.

In addition, supplementary and targeted training will be provided to employees when there:

- is a role change (either permanently or in an acting role)
- are legislative changes
- are changes to the whistleblower system, and/or
- are changes to this Policy or the *Whistleblower Procedure*.

The training will address how WMQ's whistleblower system works, including:

- the purpose of this Whistleblower Policy and Procedure
- how to make and receive Whistleblower Disclosures
- the roles and responsibilities relevant to the process
- protection and supports provided to Whistleblowers.

For WMQ's workforce, this Policy and amendments are available through the Policy & Resource Library and the Governance Hub (Speaking Up). For other individuals, this Policy and amendments are available through our external website.

WMQ will also regularly communicate (at least monthly) with aged care workers and responsible persons that we encourage Reporting of Suspected Wrongdoing.

Breaches

- Any breach of this Policy and/or the *Whistleblower Procedure* by a member of WMQ's workforce may result in formal performance management that could result in termination of employment.
- Should an employee retaliate or threaten retaliation/detrimental conduct against the Reporter of Suspected Wrongdoing, WMQ will treat this as serious misconduct in accordance with our policies.
- If a member of WMQ's workforce makes a Report of Suspected Wrongdoing without reasonable grounds, and/or one that is intentionally harmful and knowingly false, they may be subject to formal performance management including dismissal or cessation of a service.
- If a Whistleblower was involved in Suspected Wrongdoing and disclosed it, the Whistleblower may not be protected from the consequences of their involvement in the wrongdoing. Whistleblowers also remain responsible for their own conduct (even if they report under this Policy) and WMQ cannot provide protection from any external prosecution that may result.
- Where a Whistleblower has made a Whistleblower Disclosure and suspects there has been a contravention of the Whistleblower Laws, the Whistleblower Disclosure may be referred to a relevant External Prescribed Body. WMQ encourages Whistleblowers to seek independent legal advice prior to making a Whistleblower Disclosure to an External Prescribed Body.

Whistleblower Policy

Roles and Responsibilities

Position Title	Responsibilities under this procedure
WMQL Workforce	- Work to understand and comply with this Policy and applicable procedures. - Complete any training allocated and relevant for your role.
Reporter of Suspected Wrongdoing and/or The Whistleblower	- Act honestly and sincerely to ensure reasonable grounds exist for making a Report. - Provide information to assist any relevant inquiry/investigation. - Maintain confidentiality of any reported matters.
Eligible Recipient (who is a member of WMQ's workforce)	- Formalise the documentation of the report through STOPline as soon as possible after receiving the report (expected to be within 24 hours). - Maintain confidentiality of any reported matters, including the identity of the Reporter of Suspected Wrongdoing.
Risk & Assurance	- Assess any Report of Suspected Wrongdoing to determine the applicability of this policy and procedure, other legislative requirements and/or other policies and procedures. - Provide recommendations on WGOs, WPOs and the IO. - Summarise reports made under this Policy to the Audit, Finance & Risk Committee. - Maintain confidentiality of any reported matters.
Whistleblower Protection Officer (WPO)	- Provide adequate protection to the Whistleblower in line with this Policy and the <i>Whistleblower Procedure</i>. - Maintain confidentiality of any reported matters.
Whistleblower Governance Officer (WGO)	- Provide support to the Whistleblower as needed. - Conduct sufficient enquiry for any report that is subject to this policy and procedure. - Appoint a suitably qualified and independent internal or external IO. - Appoint an independent WPO to the Whistleblower. - Work with the IO to draw up the Investigation Terms of Reference, scope and procedures, ensuring actions taken in response to a report are appropriate to the circumstance. - Keep the Whistleblower informed of the progress and outcomes of any inquiry/investigation (subject to privacy requirements), unless the Report is made anonymously. - Maintain confidentiality of any reported matters.
Investigations Officer (IO)	- Work with the WGO to draw up the Investigation Terms of Reference, scope and procedures, ensuring actions taken in response to a report are appropriate to the circumstance. - Conduct the investigation in a timely manner. - Take the necessary caution to protect all parties. - Communicate with all parties (as detailed in the Investigation Terms of Reference) as the investigation proceeds. - Maintain confidentiality of any reported matters.
Chief Executive Officer	- Provide necessary resources to ensure compliance with this policy, procedure and applicable legislation. - Ensure systems and processes are in place to support this policy and procedure. - Ensure resources are available to train responsible officers. - Appoint the WGO (in consultation with the Executive Leadership Team member where appropriate).

Whistleblower Policy

	Delegate responsibilities for application of this Policy to nominated personnel within Risk & Assurance (or People & Culture where Risk & Assurance is not independent).
STOPline (Independent Hotline Provider)	- Provide WMQ with concurrent access to relevant information received to enable WMQ to investigate a Whistleblower Disclosure, as required under the relevant legislation. - If the report of suspected wrongdoing relates to Risk & Assurance, STOPline will liaise with Director – People & Culture. - Conduct investigations where appointed by WMQ.

STOPline details

- Online – go to <https://wmq.stoplinereport.com> and click “Make a report” or “Aged Care Concerns Reporting” (this is the preferred method of making a report of Suspected Wrongdoing to STOPline)
- Email – wmq@stopline.com.au
- Application – search for the “Stopline” app in the iTunes App Store or Google Play and download the free app to submit a report
- Phone – free call on **1300 304 550** (if calling from within Australia) or reverse charge to **+61 3 9811 3275** (if calling from overseas)
- Fax – fax your report to **+61 3 9882 4480** (Att: Wesley Mission Queensland C/- Stopline)
- Post – submit your report to the following address:

Wesley Mission Queensland

C/- Stopline

PO Box 403

Diamond Creek VIC 3089

Definitions

Term	Definition
Aged Care Act Eligible Recipient	WMQ as the registered provider or another registered provider including any responsible person or aged care worker of WMQ or another registered provider.
Complaint	A Report made that has been assessed as a Complaint.
Eligible Recipient	Those persons specified in s.1317AAC (1) of the <i>Corporations Act 2001</i> (Cth) including WMQ officers or senior managers or other external authorities to whom a Report can be made.
External Prescribed Body	Any external authority eligible to receive a Whistleblower Disclosure including, but not limited to, ASIC or any other external prescribed body for the purposes of s.1317AA of the <i>Corporations Act 2001</i> (Cth); or Where a Whistleblower Disclosure relates to services received under the Aged Care Act, includes: - The Aged Care Quality and Safety Commission (ACQSC) - The Department of Health, Disability and Ageing (Department).
Report	A report of Suspected Wrongdoing which will be assessed and determined to be either a Complaint or a Whistleblower Disclosure and investigated accordingly.
Reporter of Suspected Wrongdoing or Eligible Person	The individual who makes a Report in accordance with this Policy.

Whistleblower Policy

Suspected Wrongdoing	A reasonable suspicion of misconduct which could be considered to reflect an improper state of affairs within WMQ or by an officer or employee of WMQ for example, illegal, dishonest or fraudulent conduct with respect to WMQ's financial, governance or compliance-related obligations. It also includes any activity that breaches the <i>Aged Care Act 2024</i> (Cth) This includes non-compliance with legislation or unethical behaviour made to a person or entity.
Whistleblower	The individual ('Eligible Person') who made a Report which WMQ has assessed as a Whistleblower Disclosure to be investigated under this Policy.
Whistleblower Disclosure	A Report of Suspected Wrongdoing that has been assessed to be in compliance with the whistleblower provisions in the relevant legislation including the Corporations Act and the Aged Care Act, and which attracts the protections afforded by that legislation.
Whistleblower Governance Officer (WGO)	The WGOs are: • Director - Governance, Performance & Outcomes • Director - People and Culture • General Manager - Risk & Assurance. Where a report is made directly through STOPline, STOPline will notify a WGO as necessary to maintain independence in relation to the report.
Whistleblower Laws	The laws in Australia relevant to Whistleblowers including to the <i>Corporations Act 2001</i> (Cth) and the <i>Aged Care Act 2024</i> (Cth).

See Glossary of Terms and Acronyms

Related documents

Governance	• Corporate Governance Statement
Supporting Policy & Resource Documents	• Code of Conduct Policy • Conflict of Interest Policy • Conflict of Interest Procedure • Customer Feedback Policy • Customer Feedback Procedure • Employee Handbook • Preventing and Responding to Abuse and Neglect Policy • Prevention of Fraud and Corruption Policy • Privacy Policy • Sexual harassment Prevention Policy • Unsatisfactory Performance and/or Behaviour Procedure • Whistleblower Procedure • Workplace Complaints (including allegations of discrimination, sexual harassment and bullying)
Legislation/Standards	• Aged Care Act 2024 (Cth) • Corporations Act 2001 (Cth) • Taxation Administration Act 1953 (Cth)
Other	• Governance Hub (Speaking Up)

Whistleblower Policy

Approval

Version	Wesley Mission Queensland Limited Board Approved	Effective Date	Details
3	22/10/2025	28/10/2025	The Policy has been updated to comply with the <i>Corporations Act 2001</i> (Cth) and <i>Aged Care Act 2024</i> (Cth) requirements.