

Whistleblowing Policy

Policy Statement

UnitingCare is committed to fostering a culture of integrity and accountability where our people observe high standards of good governance and ethical behaviour and feel supported to disclose matters of concern.

UnitingCare recognises that the people who have a work, service or client relationship with UnitingCare or one of our business units or functional areas 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 UnitingCare and is committed to protecting the health and safety, dignity and reputation of those persons who make a Disclosure.

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.
- 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.
- Ensure UnitingCare maintains the highest standards of ethical behaviour and integrity and to contribute to continuous improvement.

Scope

This Policy applies to any Whistleblower who is an Eligible Person making a Disclosure of Reportable Conduct. Whistleblowers can be current or former directors, officers, employees, volunteers or others with a connection to UnitingCare such as contractors, consultants, suppliers and auditors or a relative or dependent of these individuals or their spouse. Whistleblowers can also be individuals or their representatives who receive funded aged care services. The Corporations Act, Tax Act, and, from 1 November 2025, the Aged Care Act provide protections for Whistleblowers.

This Policy outlines UnitingCare's obligations under these laws and provides guidance on:

- what matters can be reported under this Policy;
- who reports can be made to;
- how UnitingCare will investigate Disclosures;
- how UnitingCare will support and protect Whistleblowers;
- how UnitingCare will ensure fair treatment of individuals involved in disclosures.

While this Policy covers certain types of disclosures, UnitingCare has additional policies that provide avenues and reporting structures to raise concerns about workplace behaviour, child protection, dispute resolution, discrimination, harassment (including sexual harassment), bullying, professional

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conduct. Each of these policies provides points of contact for raising issues, including anonymous reporting options.

Principles

UnitingCare is committed to providing a safe and transparent process for Whistleblowers to report instances of Reportable Conduct, and encouraging and supporting such Disclosures, including through ensuring:

- Clear, practical, documented resources and mechanisms are communicated to support Whistleblowers making a Disclosure of Reportable Conduct.
- Timely, independent investigations of Disclosures of Reportable Conduct, enabling prompt, appropriate management. Whistleblowing activities are facilitated through clearly defined accountabilities, roles and responsibilities.
- Appropriate authority and resources support an efficient, effective Whistleblowing management system.
- Adequacy and effectiveness of the Whistleblowing management system is reviewed annually.

Requirements

These requirements outline the key elements of the Whistleblower Protection Scheme, including the protections available and how individuals can be supported in making Disclosures. For further detail on how these requirements are implemented through the procedures governing whistleblower disclosures, refer to UnitingCare's Whistleblower Procedure.

Reportable Conduct: Reportable Conduct includes any conduct in relation to UnitingCare that is dishonest, fraudulent, corrupt, unethical or illegal. This includes activity that is potentially damaging to UnitingCare's interests, both financial and non-financial. It also includes any activity that breaches the Aged Care Act.

Who can receive a Disclosure of Reportable Conduct: Reportable Conduct must be reported to one of the following Eligible Recipients:

- UnitingCare General Manager, Group Executive, Chief Financial Officer, Chief Executive Officer or Board Member
- an auditor, or member the internal audit team conducting an audit of UnitingCare
- an appointed Whistleblower Protection Officer
- the appointed Whistleblower Governance Officer
- the UnitingCare Integrity Hotline (refer Appendix 1) or
- in special circumstances, other external prescribed bodies.

Where Reportable Conduct relates to a suspected breach of the Aged Care Act, a Disclosure can also be made orally or in writing to:

- the Aged Care Quality and Safety Commission (**ACQSC**),

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- the Department of Health, Disability and Ageing (**Department**),
- an aged care worker or responsible person of UnitingCare,
- a police officer; or
- an independent aged care advocate (such as Older Persons Advocacy Network).

How UnitingCare will investigate a Disclosure: Where an investigation into alleged Reportable Conduct is considered appropriate, this will be undertaken, as soon as practicable after the Disclosure is made, by an appointed Whistleblower Investigation Officer in accordance with the UnitingCare Whistleblowing Procedure.

Investigations will be conducted according to the rules of natural justice and will be carried out independently of the person(s) about whom an allegation has been made.

Anonymous reporting: Anonymous Disclosures of Reportable Conduct will be accepted. However, this reporting method places significant limitations on the ability of UnitingCare to undertake a proper and appropriate investigation, gather additional information to assist the investigation or provide feedback on the outcome. Where a matter is reported anonymously, specific protection mechanisms may not be able to be provided by the Whistleblower Protection Officer.

Protections for Whistleblowers: In dealing with a Disclosure of Reportable Conduct, UnitingCare will ensure that the following protections are in place for Whistleblowers:

- (a) **Confidentiality:** All information received will be treated confidentially and sensitively. The identity or any information which would be likely to identify the Whistleblower will only be shared if:
 - (i) the Whistleblower has provided consent to share that information or
 - (ii) the disclosure of confidential information is allowed or required by law (for example, where a Whistleblower makes a Disclosure to a legal practitioner for the purpose of seeking advice on Whistleblower laws or if a regulator requires the information).
 - (iii) during the course of an investigation, if disclosure of information which is likely to identify the Whistleblower is necessary for the purposes of the investigation, all reasonable steps must be taken to reduce the risk that the Whistleblower will be identified as a result of that disclosure.
- (b) **Anonymity:** Reasonable steps will be taken to protect the identity of Whistleblower when an anonymous Disclosure is made.
- (c) **Liability*:** A Whistleblower, with reasonable grounds to suspect Reportable Conduct, will not be subject to civil, contractual, criminal or administrative liability (including disciplinary action) in making a Disclosure.
- (d) **Immunity*:** Whistleblowers are not subject to civil or criminal liability for making a Disclosure and the information is not admissible as evidence in criminal proceedings against the discloser.

*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 UnitingCare cannot provide protections for the person from external prosecution.

Detriment: Conduct which could cause Detriment against a Whistleblower is prohibited. As a result of making a Disclosure, a Whistleblower must not be subject to detrimental treatment, victimisation or threats.

If a Whistleblower believes they or their family are or have been subject to Detriment, they should immediately report the matter to the nominated Whistleblower Protection Officer.

Support for Whistleblowers: Once Reportable Conduct has been disclosed, Whistleblowers will be protected and supported, in accordance with the terms of this Policy and the Whistleblowing Procedure by an appointed Whistleblower Protection Officer throughout the process.

Escalations available to Whistleblowers: In adhering to this Policy, Whistleblowers will not be restricted from disclosing, providing information to or communicating with a government regulator, law enforcement body or agency regarding Reportable Conduct.

Responsibilities

Entity	Responsibility
Chief Executive Officer (CEO)	<p>For UnitingCare:</p> <ul style="list-style-type: none"> ensure systems and processes are in place to support the Whistleblowing Policy; ensure resources are available to train responsible officers; appoint the Whistleblower Governance Officer; appoint the Whistleblower Liaison Officer where it is not appropriate for a Group Executive to appoint; delegate responsibilities for application of this Policy to nominated personnel within each business unit and functional area.

Entity	Responsibility
Group Executive	<ul style="list-style-type: none"> advise the CEO and the Whistleblower Governance Officer of the Disclosure; allocate the Whistleblower Protection Officer; determine if Disclosure received is Reportable Conduct within two business days; appoint the Whistleblower Investigation Officer and the Whistleblower Liaison Officer, if the Whistleblower Investigation Officer is a contractor external to UnitingCare in collaboration with the Whistleblower Protection officer; advise the Whistleblower Governance Officer of any Reportable Conduct that will enact operation of this Policy and its protections.
Whistleblower Governance Officer	<ul style="list-style-type: none"> oversight systems, processes, and awareness material relating to the application of this Policy; ensure each Disclosure of wrongdoing is appropriately reviewed or investigated by an investigator who is independent of the area where the wrongdoing is alleged to have occurred; ensure actions taken in response to an enquiry or investigation are appropriate to the circumstance; report Disclosures of Reportable Conduct to the Audit, Risk and Compliance Committee; consult with the CEO to appoint the Whistleblower Liaison Officer where it is not appropriate for a Group Executive to appoint; delegate responsibilities for application of this Policy to nominated personnel within each business unit and functional area; ensure processes are established to monitor the performance and effectiveness of this Policy.
Whistleblower Investigation Officer	<ul style="list-style-type: none"> conduct preliminary investigation into a reported matter; gather evidence as part of the investigation (including evidence from internal and external witnesses and experts as required); provide a formal report to the Group Executive, the Whistleblower Protection Officer and the Whistleblower Governance Officer at the completion of the investigation, and; if the Whistleblower Investigation Officer is external, then for these purposes liaise with the Whistleblower Liaison Officer as required.
Whistleblower Liaison Officer	<ul style="list-style-type: none"> promptly gather and provide to the Whistleblower Investigation Officer all information and documents as reasonably requested.

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Entity	Responsibility
Whistleblower Protection Officer	<ul style="list-style-type: none"> provide general advice to anyone seeking information about the Whistleblowing Policy and Procedure prior to making a Disclosure; advise the Group Executive and Whistleblower Governance Officer of identified Reportable Conduct for reporting to the Chief Executive Officer; determine whether Disclosure received is Reportable Conduct within two business days; in collaboration with the Group Executive, determine the Whistleblower Investigation Officer; protect and support the Whistleblower and keep them informed of the progress and outcomes of the investigation subject to considerations of privacy of others involved in the alleged Reportable Conduct.
Whistleblower	<ul style="list-style-type: none"> make a Disclosure of Reportable Conduct based on reasonable grounds to suspect that the information being provided is true; cooperate with the investigative process and providing information to assist any investigation into the matter disclosed (unless disclosed anonymously); maintain confidentiality of any reported matters.
Senior Leaders Managers Supervisors	<ul style="list-style-type: none"> ensure staff within their area of control are aware of and understand this Policy, its purpose and intent; support the appointed Whistleblower Protection Officer in performing their role.
Eligible Recipient	<ul style="list-style-type: none"> ensure Disclosure of suspected Reportable Conduct is referred to the Group Executive and Whistleblower Protection Officer within one business day; ensure protections are maintained in line with this Policy.
Employees	<ul style="list-style-type: none"> be aware of and understanding the intent of this Policy; adhere with the requirements of this Policy and the Procedure and <i>'blowing the whistle'</i> on Reportable Conduct by making a Disclosure to an Eligible Recipient.

Definitions

Aged Care Act: means the Aged Care Act 2024 (Cth)

Corporations Act: means the Corporations Act 2001 (Cth)

Detriment: means the following actual or threatened conduct against a Whistleblower as a result of making a Disclosure:

- dismissal from employment or termination of supply or service;
- injury to employment or position or duties altered to a disadvantage;
- unlawful discrimination;
- harassment, bullying or intimidation;
- harm or injury, including psychological harm;
- damage to personal property; or
- reputational, financial or any other damage.

Disclosure: means a reporting of Reportable Conduct by an Eligible Whistleblower to an Eligible Recipient, in accordance with this Policy and in compliance with the Whistleblower Protection Scheme.

Eligible Person: means an individual who is, or has been, any of the following:

- a current or former officer of UnitingCare;
- a current or former Board member of UnitingCare
- a current or former employee of UnitingCare (including, but not limited to employees who are permanent, part-time, fixed term, interns or temporary);
- a current and former contractor, subcontractor, volunteer, student, or supplier providing goods or services to UnitingCare whether paid or unpaid (including their employees);
- current and former relatives, dependents, or spouses of the individuals listed above;
- an individual who receives funded aged care services provided by UnitingCare, their supporters or authorised representatives; or
- any other individual for the purpose of the Aged Care Act.

Eligible Recipient: means a UnitingCare employee (or other external authorities in special circumstances) to whom a Disclosure of Reportable Conduct can be made, as outlined at section 5.2 of the Whistleblowing Policy.

Employees: means all individuals engaged under an employment contract with UnitingCare, including full-time, part-time, casual, and fixed-term employees, as well as apprentices and trainees.

External Prescribed Body: means an external authority eligible to receive a Disclosure of Reportable Conduct as prescribed by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).

Personal Work - Related grievance: are grievances where the information concerns a personal work-related grievance of the discloser and the information concern any matter in relation to the discloser's employment or former employment having (or tending to have) implications for the discloser personally and does not include Reportable Conduct.

Reportable Conduct: means conduct where an Eligible Whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs within UnitingCare, including financial, governance, or compliance-related matters; or

- UnitingCare, or one of its Board members, officers, employees, contractors, or volunteers, has engaged in conduct that:
 - constitutes an offence under Commonwealth or state laws punishable by imprisonment for 12 months or more;
 - constitutes an offence against or contravention of the:

- *Taxation Administration Act 1953 (Cth) and other tax laws administered by the Australian Taxation Office;*
- *Australian Securities and Investments Commission Act 2001 (Cth);*
- *Financial Sector (Collection of Data) Act 2001 (Cth);*
- *Corporations Act 2001 (Cth);*
- *Superannuation Industry (Supervision) Act 1993 (Cth);*
- *Aged Care Act 1997 (Cth), Aged Care Act 2024 (Cth), and associated regulations;*
- *any other laws, regulations, or instruments made under these Acts and relevant to UnitingCare's operations.*

(Defined as, Whistleblower Laws)

- presents a danger to the public or the financial system;
 - involves any other conduct that falls within the scope of Whistleblower Protection Scheme.
- Reasonable grounds to believe that the Public Interest Information disclosed is true or may be true and is of sufficient significance to justify its disclosure.

It also includes situations where an Eligible Whistleblower believes that the information may assist UnitingCare's compliance, governance, or financial affairs.

Tax Act: means the Taxation Administration Act 1953 (Cth)

UnitingCare: means UnitingCare Queensland Limited

Whistleblower: means an Eligible Person who makes a Disclosure of Reportable Conduct in the manner described in this Policy.

A Whistleblower is generally someone with inside knowledge of an organisation, who reports misconduct or dishonest or illegal activity that has occurred within the organisation.

'Whistleblower' is given the same meaning as the term 'Eligible Whistleblower' in section 9 of the Corporations Act, including any present or former:

- officers;
- employees;
- suppliers and the employees of any suppliers;
- associates; and
- the relatives of anyone referred to as an 'Eligible Person' above.

Whistleblowing or 'blow the whistle': the term used to describe making a Disclosure, whether anonymous or otherwise, of alleged Reportable Conduct in accordance with this Policy.

Whistleblower Governance Officer: a designated UnitingCare representative, as identified in the UnitingCare Whistleblowing Contact Officers resource document, who has responsibility for general oversight of systems and processes relating to the application of this Policy.

Whistleblower Investigation Officer: a dedicated UnitingCare representative (director, manager, employee or contractor of UnitingCare) who has responsibility for conducting investigations into reports received from a Whistleblower. A person who is a Whistleblower Protection Officer should not be appointed a Whistleblower Investigations Officer within the same business unit or functional area to the extent necessary. If the Whistleblower Investigation Officer is a contractor external to UnitingCare, the Whistleblower Investigation Officer must liaise with the Whistleblower Liaison Officer to discharge their duties where reasonably necessary.

Whistleblower Liaison Officer: a representative within the service stream of UnitingCare where the alleged Reportable Conduct occurred who is appointed in circumstances where the Whistleblower Investigation Officer is a contractor external to UnitingCare and assists that Whistleblower Investigation.

Whistleblower Protection Officer: a designated UnitingCare representative, as identified in the UnitingCare Whistleblowing Contact Officers resource document, who has responsibility for protecting a Whistleblower within the intent of this Policy.

Whistleblower Protection Scheme: refers to the legal protections available to Eligible Whistleblowers under the Corporations Act, the Tax Act and, from 1 November 2025, the Aged Care Act. In certain cases, protections may also apply under the Public Interest Disclosure Act 2010 (Qld).

Appendix 1 – UnitingCare Integrity Hotline

UnitingCare Integrity Hotline - operated by STOPline



1300 304 550



unitingcareqld@stopline.com.au

Online STOPline Disclosure Form



<https://sldisclosures.typeform.com/to/McoZzB4w>



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