Policy No. POL 50	
Whistleblower Policy	PRESTIGE inhome care

1. Statement

Prestige Inhome Care is committed to the highest standards of ethical conduct, integrity, transparency, and accountability in all aspects of our operations, including the delivery of quality home care services.

We foster a culture where our employees, contractors, volunteers, clients and other stakeholders feel empowered and supported to speak up without fear of retaliation if they feel their rights are not being upheld or if they perceive any misconduct, malpractice or unethical behaviour.

Prestige will take all disclosures seriously and respond in a fair, timely and confidential manner. Where appropriate, independent investigators may be engaged to ensure impartiality.

2. Objectives

- Encourage the reporting of wrongdoing, including conduct that breaches the **Aged Care Act 2024**, the **Corporations Act 2001**, **the NDIS Act** or any other applicable laws, regulations or internal policies.
- Ensure that individuals who disclose wrongdoing (whistleblowers) are protected from victimisation, harassment, or any form of detriment.
- Outline how reports will be managed, investigated, and responded to appropriately and confidentially.
- Demonstrate our commitment to a safe, respectful, and lawful work environment that prioritises the safety, dignity, and wellbeing of the older people we support.

3. Scope

This policy applies to a broad group of stakeholders associated with our operations, including:

- Current and former employees
- Volunteers and contractors
- Clients, their families, carers and advocates
- Suppliers and external service partners
- Relatives and dependents of all of the above

4. Definitions

Whistleblower Disclosure – a report made regarding misconduct or an improper state of affairs within an organisation including:

- Serious misconduct or unethical behaviour.
- Attempts to conceal such misconduct.
- Fraud, theft or misuse of funds.
- Unlawful, corrupt or unsafe practices.
- Conflicts of interest or governance failures

Whistleblower – a current or former employee, volunteer, contractor, or supplier of Prestige, a client or their representatives.

Misconduct under the Aged Care or NDIS Acts:

- Neglect, abuse, or exploitation.
- Breaches of the Aged Care or NDIS Code of Conduct.
- Failure to comply with the Aged Care Quality Standards or the NDIS Practice Standards.
- Dishonest or unsafe delivery of care and services.
- Misuse or mismanagement of government-funded subsidies.

***Corporate Misconduct*:**

- Fraudulent financial practices (e.g. false invoices, overcharging clients).
- Breaches of company policies or ethical standards.
- Conflicts of interest not disclosed.
- Insider trading (for companies regulated under the Corporations Act).
- Victimisation or discrimination of staff or whistleblowers.

5. Responsibilities:

Board / Executive Leadership:

- Ensure legal compliance and oversight
- Promote a culture of safety and openness

Whistleblower Protection Officer:
- Receive and manage disclosures
- Safeguard the interests of whistleblowers
- Coordinate investigation and reporting

Managers and Supervisors:
- Support and encourage staff to speak up
- Escalate concerns appropriately
- Prevent and report any retaliation

All Staff, Contractors, and Volunteers:
- Be familiar with this policy
- Report unethical or unlawful conduct
- Treat whistleblowers with respect and support

5. Reporting Process:

5.1 Internal Reporting

At Prestige, we are committed to maintaining a safe and respectful environment. If you wish to raise a concern, you can do so through our secure internal online portal

You can:
- Submit a report at any time via the online portal.
- Choose to remain anonymous or provide your name.
- Securely upload supporting documents or materials.
- Receive updates and respond to messages through the secure message board.

All reports will be reviewed and managed by Prestige's nominated Whistleblower Protection Officers in line with our whistleblower policy.

You can make a report:

• Online 24/7	https://prestigeinhomecare.relyplatform.com/home

Whistleblower Protection officers:

We are here to listen and respond appropriately to your concerns.

Primary: Flavia Manderson – Quality and Risk Manager
Merika Brown – Executive Assistant
Lauren Brown – Acting General Manager People

5.2 External Reporting

If you are not comfortable making your report internally, you may disclose directly to:

- The **Aged Care Quality and Safety Commission** for issues relating to care and service delivery or provider compliance.
- The NDIS Quality and Safeguards Commission for issues related to relating to care and service delivery or provider compliance.
- **Australian Securities and Investments Commission (ASIC)** for Corporate or financial misconduct.
- **Australian Prudential Regulation Authority** (**APRA)** for Corporate or financial misconduct involving prudential matters.
- **Fair Work Ombudsman** for employment-related matters.

5.3 Anonymous Disclosures

You may choose to remain anonymous. Your identity will not be disclosed without your consent unless legally required (e.g. in the public interest or for investigations by regulators). Anonymous reports may still be investigated to the extent practicable.

6. Handling disclosures

- **Acknowledgement** – Within 5 business days, the whistleblower will receive confirmation (unless anonymous).
- **Initial Assessment** – The Whistleblower Protection Officer will assess the nature of the disclosure. An appropriate impartial investigator will be assigned.
- **Investigation** – A detailed and objective investigation will be carried out. The whistleblower may be contacted for more information.
- **Outcome** – Findings will be documented and acted upon. The whistleblower will be informed of the outcome where appropriate

Investigations are typically completed within 30–60 days unless there are exceptional circumstances.

7. Whistleblower Protections

Under both the **Corporations Act 2001** and **Aged Care Act 2024**, you are entitled to the following protections:

- **Confidentiality**: Your identity will not be disclosed without your consent, except where required by law.
- **Protection from retaliation**: Dismissal, demotion, harassment, or discrimination in response to your disclosure is strictly prohibited.
- **Immunity**: From civil, criminal, or administrative liability related to the act of making a protected disclosure.
- **Access to compensation**: If victimised, you may be entitled to legal remedy or compensation.

8. Policy Review

This policy will be reviewed **annually** or following:

- Changes to legislation or regulations
- Serious incidents or investigations
- Internal audit findings or feedback from stakeholders

9. Related Documents

POL 44 Complaints and Feedback Policy

POL 43 Code of Conduct