

## WHISTLEBLOWER POLICY

Connect: Inner West Community Transport Group Inc (Connect) is committed to lawful, ethical and safe delivery of home and community-based aged care services.

This Policy establishes a whistleblower system that:

- enables concerns about actual or suspected breaches of the Aged Care Act 2024 to be raised safely
- protects whistleblowers from victimisation or retaliation
- ensures disclosures are managed confidentially, fairly and promptly
- satisfies the conditions of registration for Category 1 – Home and Community Services.

Record of policy development		
Version	Date approved	Date for review
1	16 March 2026	March 2028

Responsibilities and delegations	
This policy applies to	Directors and staff
Specific responsibilities	General Manager
Policy approval	Board

Policy context – this policy relates to:	
Standards	Aged Care Quality and Safety Commission
Legislation	Aged Care Act 2024 Aged Care Rules 2025
Contractual obligations	
Organisation policies	
Forms, record keeping, other documents	

### 1. Purpose

**Connect: Inner West Community Transport Group Inc (Connect)** is committed to lawful, ethical and safe delivery of **home and community-based aged care services**.

This Policy establishes a whistleblower system that:

- enables concerns about actual or suspected breaches of the Aged Care Act 2024 to be raised safely
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  - satisfies the conditions of registration for **Category 1 – Home and Community Services**.
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## 2. Scope

This Policy applies to all persons involved in or affected by **home and community services** delivered by Connect, including:

- employees and aged care workers (clinical and non-clinical)
  - contractors, agency staff and sole traders
  - volunteers and students
  - care recipients, family members and representatives
  - visitors and community members.
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## 3. Legislative Framework

This Policy is made under and must be read in conjunction with:

- **Aged Care Act 2024 (Cth)**
  - **Aged Care Rules 2025**
  - conditions of registration applicable to Category 1 providers
  - guidance issued by the Aged Care Quality and Safety Commission.
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## 4. What Is a Whistleblower Disclosure

A whistleblower disclosure is information provided by a person who **reasonably suspects** conduct that:

- breaches the Aged Care Act 2024 or associated Rules
- breaches conditions of registration
- places a care recipient at risk of harm, neglect or exploitation
- involves serious misconduct, systemic failure or poor governance
- indicates failure to meet provider responsibilities for home-based care.

This includes concerns arising during **in-home service delivery**, community visits, care coordination activities, or remote service provision.

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## 5. Who Can Make a Disclosure

A whistleblower disclosure may be made by:

- an aged care worker delivering services in the home or community
- a coordinator, scheduler or manager
- a contractor or subcontractor
- a care recipient receiving home services
- a family member, carer or representative
- any other person with reasonable grounds to suspect a breach.

Disclosures may be made **orally, in writing, or anonymously**.

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## 6. Eligible Recipients

Disclosures may be made to any of the following:

- the **Aged Care Quality and Safety Commissioner** or Commission staff
  - the **Department of Health, Disability and Ageing**
  - a **responsible person** of Connect
  - a worker or manager of Connect
  - a **police officer**
  - an **independent aged care advocate**.
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## 7. How to Make a Disclosure

### Internal Reporting

Disclosures can be made:

- verbally to a supervisor, manager or responsible person
- in writing by email or letter
- via any internal reporting or incident system.

### Internal contact details:

- Position: General Manager
- Phone: 02 9558 6800
- Email: [gm@connectinnerwest.org.au](mailto:gm@connectinnerwest.org.au)

### External Reporting

Disclosures may also be made directly to external authorities at any time.

### Anonymous Reporting

Anonymous disclosures are accepted and will receive the same protections under the Act.

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## 8. Protections for Whistleblowers

A person who makes a qualifying disclosure is protected from:

- dismissal, demotion or termination of engagement
- harassment, intimidation or discrimination
- adverse changes to work arrangements
- civil, criminal or administrative liability arising from the disclosure.

Any retaliation or victimisation is strictly prohibited and may result in disciplinary action or contract termination.

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## 9. Confidentiality

**Connect** will:

- take all reasonable steps to protect the identity of the whistleblower
- limit access to disclosure information to authorised personnel only
- securely store all records relating to disclosures
- only disclose identifying information where required or permitted by law, or with consent.

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## 10. Managing and Investigating Disclosures

All whistleblower disclosures will be:

- assessed promptly upon receipt
- managed independently and fairly
- investigated proportionately to the seriousness of the concern
- escalated to external authorities where required.

Where relevant, findings will inform:

- quality improvement activities
- workforce supervision and training
- risk management and governance oversight.

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## 11. Interaction With Other Systems

If a disclosure is also a complaint, incident or feedback matter, it will be managed **under this whistleblower system** to ensure protections apply.

This Policy operates alongside:

- the Complaints and Feedback Policy
- the Incident Management System
- the Risk Management Framework.

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## 12. False or Malicious Disclosures

This Policy does not protect disclosures that are knowingly false or made with malicious intent. Such conduct may lead to disciplinary action.

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## 13. Training and Awareness

**Connect** will ensure that:

- aged care workers delivering home and community services understand this Policy

- managers and responsible persons are trained in handling disclosures
  - care recipients and families are informed that concerns can be raised safely
  - whistleblower protections are regularly communicated.
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#### **14. Review and Governance**

This Policy will be:

- reviewed **regularly**
  - reviewed following legislative or regulatory changes
  - approved and overseen by the governing body or responsible person.
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End document