

Whistleblower

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1 PURPOSE

The United Protestant Association of NSW Ltd (UPA or Provider) commits to the highest standard of conduct and ethical behaviour, corporate compliance, and corporate governance. UPA aims to improve organisational culture and transparency and deter wrongdoing through its whistleblower protection system. UPA encourages disclosures of wrongdoing and misconduct by providing a safe mechanism for reporting misconduct and providing protection to those who report misconduct that constitutes, but is not limited to, unethical, illegal, fraudulent, or undesirable conduct involving UPA.

UPA is committed to:

- a culture of lawful, ethical and transparent conduct;
- encouraging the reporting of Wrongdoing;
- protecting whistleblowers from victimisation, discrimination and breach of confidentiality; and
- investigating disclosures fairly, promptly and confidentially, and, where Wrongdoing is substantiated, taking appropriate corrective action.

2 SCOPE

This policy applies to the following persons: All current or former:

- (a) all aged-care workers (employees, contractors, agency, volunteers, trainees and students);
- (b) responsible persons and members of governing bodies;
- (c) former workers and officers;
- (d) individuals receiving services from the Provider, their supporters, family or representatives;
- (e) suppliers and their employees;
- (f) any person who discloses wrongdoing relating to the Provider.

An Eligible Whistleblower can remain anonymous and still qualify for protection.

The Aged Care Act applies to approved providers.

The Corporations Act applies to public companies and large proprietary companies.

A Whistleblower may make a complaint under either or both the Aged Care Act and the Corporations Act. The Aged Care Act does not limit other State or Territory laws.

3 DEFINITIONS

Term	Definition
Aged Care Act	Means the Corporations Act 2001 (Cth)
Commission	Means the Aged Care Quality and Safety Commission
Corporations Act	Means the Corporations Act 2001 (Cth)
Detriment	(under the Corporations Act) - Has the meaning in section 1317ADA of the Corporations Act and includes: a) dismissal of an employee;

Term	Definition
	<ul style="list-style-type: none"> b) injury of an employee in his or her employment; c) alteration of an employee's position or duties to his or her disadvantage; d) discrimination between an employee and other employees of the same employer; e) harassment or intimidation of a person; f) harm or injury to a person, including psychological harm; g) damage to a person's property; h) damage to a person's reputation; i) damage to a person's business or financial position; j) any other damage to a person.
Disclosure	Any information provided under this policy about actual or suspected Wrongdoing .
Eligible Recipient under the Aged Care Act	<p>Under the Aged Care Act means:</p> <ul style="list-style-type: none"> a) an Appointed Commissioner or a member of the staff of the Commission; b) the System Governor, or an official of the Department; c) a registered provider; d) a responsible person of the registered provider; e) an aged care worker of a registered provider; f) a police officer; g) an independent aged care advocate.

Term	Definition
Eligible Recipient under the Corporations Act	<p>Under the Corporations Act means:</p> <ul style="list-style-type: none"> a) a director, company secretary, company officer, or senior manager of the company or organisation, or a related company or organisation; b) an auditor, or a member of the audit team, of the company or organisation, or a related company or organisation; c) an actuary of the company or organisation, or a related company or organisation; d) a person authorised by the company or organisation to receive whistleblower disclosures; e) ASIC or the Australian Prudential Regulation Authority (APRA), or f) your lawyer, if disclosing to obtain legal advice or representation under the whistleblower provisions of the Corporations Act.
Wrongdoing	Conduct that may contravene the Aged Care Act, the Corporations Act 2001, any other law, professional standard, the Aged Care Quality Standards, the Aged Care Code of Conduct, or internal policies (e.g., fraudulent use of subsidies, abuse or neglect of consumers, serious safety risk, breach of privacy, retaliation against complainants, systemic under-staffing, bribery, etc.).
Whistleblower Protection Officer (WPO)	Senior manager independent of line management for investigation purposes who receives and manages protected disclosures.
Whistleblower Investigations Officer (WIO)	Person appointed by the WPO to investigate a matter (must be independent of area involved).

4 PROCEDURES

4.1 General

A whistleblower is a person who reports wrongdoing.

Under the Aged Care Act and Corporations Act, special protections apply to a person if they are an 'eligible whistleblower' and make a protected disclosure regarding an organisation to the Commission, ASIC, AHPRA or an eligible recipient, based on reasonable grounds.

A person who speaks up under this Policy's terms and scope, or is deemed as a whistleblower by UPA, is known as an Eligible Whistleblower (**Eligible Whistleblower**) for the purpose of this Policy and should be protected as a result of making a report.

To ensure the safety of those persons who report Reportable Conduct, UPA provides protections and measures so that they may do so with confidentiality and free of fear, intimidation, disadvantage, or reprisal.

When an Eligible Whistleblower makes a disclosure of Reportable Conduct:

- a) Their identity must remain confidential according to their wishes.

- b) They will be protected from reprisal, discrimination, harassment, or victimisation for making the disclosure.
- c) The disclosure will be taken seriously by UPA and UPA will act on disclosures promptly after the disclosures are provided to UPA
- d) An independent internal inquiry or investigation will be conducted.
- e) Issues identified from the inquiry/investigation will be resolved and/or rectified.
- f) Any retaliation for having made the disclosure will be treated as serious wrongdoing under this Policy.

4.2 Reportable Conduct

For the purpose of this policy, Reportable Conduct is defined as any past, present, or expected future activity, behaviour or situation reasonably considered to be one or more of the following:

- a) Wrongdoing;
- b) dishonest;
- c) corrupt;
- d) fraudulent;
- e) illegal;
- f) a breach of any law or regulation, including the Corporations Act;
- g) improper governance and/or financial management (e.g. accounting, internal controls, compliance, audit, or other matters of concern);
- h) a serious impropriety or improper state of affairs or circumstances;
- i) any behaviour relating to the sexual exploitation and/or abuse of children or adults;
- j) endangering health and or safety;
- k) a serious mismanagement of resources;
- l) detrimental to the reputation of UPA and/or our services/programs;
- m) concealment of any of the conduct set out above.

4.3 Disclosures that qualify for protection under the Aged Care Act

Under s 547 of the Aged Care Act a disclosure qualifies for protection if:

- a) The discloser has reasonable grounds to suspect wrongdoing; and
- b) The disclosure is made to an Eligible Recipient; and
- c) the disclosure is made orally or in writing (and whether made anonymously or not); and
- d) the matter concerns an actual or suspected contravention of the Aged Care Act 2024 or other applicable law.

4.4 Disclosures that qualify for protection under the Corporations Act

Under the Corporations Act you must have reasonable grounds to suspect that the information you are disclosing about the company or organisation concerns:

- a) misconduct, or
- b) an improper state of affairs or circumstances.

'Reasonable grounds' means that a reasonable person in your position would also suspect the information indicates misconduct or a breach of the law.

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for protection under the Corporations Act: section 1317AADA Corporations Act.

Anonymous disclosures are accepted and protected.

4.5 Disclosures under the Corporations Act

Under the Corporations Act an 'eligible whistleblower' is defined as a current or former:

- a) employee of the company or organisation the disclosure is about, or a related company or organisation;
- b) officer (usually that means a director or company secretary) of the company or organisation the disclosure is about, or a related company or organisation;
- c) person (or employee of a person or entity) who has supplied goods or services to the company or organisation the disclosure is about, or a related company or organisation. This can be either paid or unpaid and can include volunteers;
- d) associate of the company or organisation, usually a person with whom the company or organisation acts in concert;
- e) trustee, custodian or investment manager of a superannuation entity, or an officer, employee, or a goods or service provider to a trustee, custodian, investment manager, or
- f) spouse, relative or dependent of one of the people referred to above, or a dependent of such an Individual's spouse.

While an 'eligible whistleblower' under the Corporations Act must hold or have held one of these roles to access the protections under the Corporations Act, the 'eligible whistleblower' does not have to identify themselves or their role, and the 'eligible whistleblower' can raise their concerns anonymously.

4.6 How to raise concern/make a disclosure

If you are a Whistleblower, there are various ways you can report Reportable Conduct. You may choose to notify any of the following people as you deem appropriate:

A. Internal channels (preferred but not mandatory)

- a) An Eligible Recipient (as defined above);
- b) the Whistleblower Protection Officer - please refer to the contact section below;
- c) Chief Executive / Chair of Audit & Risk Committee.

Any responsible person (previously referred to as 'key personnel') or aged-care worker who receives a complaint must immediately pass the disclosure to the WPO.

B. External channels

- a) Aged Care Quality and Safety Commission (Commission) – 1800 951 822.
- b) System Governor (Secretary of the Department of Health and Aged Care).
- c) Police (for criminal matters).
- d) Independent aged-care advocate (e.g., OPAN).
- e) ASIC or APRA for financial/regulatory breaches (under Corporations Act).

The discloser may also choose at lodgement to have the matter treated instead as a complaint / feedback under s 165(2) Aged Care Act – the WPO will facilitate this request.

If you wish to report anonymously you may do so by contacting STOPLINE on 1300 30 45 50 or at Whistleblower Hotline Program - Whistleblower Hotline & Integrity Services (stopline.com.au). The

STOPLINE is an independent portal used to receive disclosures of wrongdoing and misconduct as well as unresolved reports of wrongdoing. The STOPLINE is independent of UPA line management so that an objective assessment of the disclosure can be made.

4.7 Protected Disclosures under this Policy

An Eligible Whistleblower will not be subject to adverse actions (dismissal, demotion, suspension, harassment, or other forms of discrimination) for raising an allegation of Reportable Conduct in good faith and in the honest belief that there is evidence of misconduct in accordance with this Policy.

4.8 Protection from Victimisation

Victimisation of a whistleblower or any person assisting an investigation is strictly prohibited (s 551 of the Aged Care Act).

Retaliatory acts and threats of retaliatory action will result in disciplinary action up to termination and may attract civil penalties).

Whistleblowers are not liable for civil, criminal or administrative sanctions for making a protected disclosure (s 548 of the Aged Care Act).

The Provider will offer reasonable supports such as Employee Assistance Program, adjustments to work arrangements, leave or other measures.

This policy provides for protection for Eligible Whistleblowers from victimisation, retaliation, or repercussion and personal or financial disadvantage to anyone who makes a disclosure of Reportable Conduct in good faith with reasonable grounds to suspect the Reportable Conduct has occurred.

UPA is committed to providing appropriate and timely support for Eligible Whistleblowers as appropriate to the circumstances.

UPA will not tolerate retaliation or adverse action taken against an Eligible Whistleblower making a disclosure of Reportable Conduct.

4.9 Statutory Protections under the Aged Care Act

Section 548 of the Aged Care Act provides protections.

If an individual makes a disclosure that qualifies for protection under section 547:

- a) the individual is not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure; and
- b) no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the individual on the basis of the disclosure.

Note: The individual is still subject to any civil or criminal liability for conduct of the individual that may be revealed by the disclosure.

Without limiting the above, a contract to which the individual is a party may not be terminated on the basis that the disclosure constitutes a breach of the contract.

4.10 Statutory Protections under the Corporations Act

In addition, the Corporations Act protects Eligible Whistleblowers against certain legal actions related to making the Reportable Conduct disclosure, including:

- a) criminal prosecution (and the disclosure cannot be used against the whistleblower in a prosecution, unless the disclosure is false);
- b) civil litigation (such as for breach of an employment contract, duty of confidentiality, or other contractual obligation);

- c) administrative action (including disciplinary action);
- d) no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the person on the basis of the disclosure; and
- e) in some circumstances, the information disclosed is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Under the Corporations Act, a person can access the legal rights and protections for whistleblowers in the Corporations Act if the person meets the definition of an 'eligible whistleblower' set out in the Corporations Act.

4.11 Confidentiality and anonymity

- a) The WPO will keep the discloser's identity confidential at all times unless the discloser consents, disclosure is required by law, or is necessary to lessen or prevent a serious threat to health or safety (s 549-550 of the Aged Care Act).
- b) All records are stored in an encrypted, access-restricted whistleblower register.
- c) Breach of confidentiality may lead to disciplinary action and civil penalties (s 550 of the Aged Care Act).
- d) Certain disclosures are authorised under section 550(2) of the Aged Care Act, including if the disclosure is:
 - the disclosure is made to an Appointed Commissioner or a member of the staff of the Commission; or
 - the disclosure is made to the System Governor, or an official of the Department; or
 - the disclosure is made to the Inspector-General of Aged Care; or
 - the disclosure is made to a police officer; or
 - the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the relevant part of the Aged Care Act; or
 - the disclosure is made with the consent of the discloser; or
 - the disclosure is necessary to lessen or prevent a serious threat to the safety, health or wellbeing of one or more individuals; or
 - the disclosure is made to a court, tribunal or a Royal Commission (within the meaning of the *Royal Commissions Act 1902*); or
 - the discloser elects to have the qualifying disclosure managed or dealt with as:
 - complaint under section 361 of the Aged Care Act; or
 - a complaint or feedback under paragraph 165(1)(b) of the Aged Care Act; or
 - both of the following apply:
 - the confidential information is in the public domain before the disclosure is made;
 - the original disclosure of the confidential information into the public domain (before the disclosure is made) was not in contravention of subsection (1).
- e) Subsection 550 (1) of the Aged Care Act does not apply if:
 - the confidential information disclosed by the entity (as mentioned in paragraph (1)(b));
 - is not the identity of the discloser; and

- is reasonably necessary for the purposes of dealing with the matter referred to in paragraph 547(c) to which the qualifying disclosure relates; and
- the entity takes all reasonable steps to reduce the risk that the discloser will be identified as a result of the disclosure of the confidential information referred to in paragraph (1)(b).

If you disclose Reportable Conduct, every effort will be made to keep your identity confidential as far as is reasonably possible.

UPA will also ensure that the identity of persons mentioned in a disclosure of Reportable Conduct are also kept confidential.

To ensure the investigation of alleged Reportable Conduct is not jeopardised, and to ensure the principles of natural justice are adhered to, you will be expected to keep the fact that you have reported a concern, the nature of the concern and the identity of those involved, confidential.

There may be circumstances under which, due to the nature of the report or investigation, it will be necessary to disclose your identity. If it is our view that such circumstances exist, or may exist in the future, we will make every effort to inform you that your identity is likely to be disclosed.

If it is necessary for you to participate in the investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps taken to protect you from victimisation or detriment as a result of the disclosure.

Whilst UPA accepts that anonymous disclosures are sometimes necessary, they can be difficult to investigate and act upon, particularly in the absence of corroborating evidence.

4.12 Consequences of Victimisation or False Reporting

UPA will treat all disclosures of Reportable Conduct seriously and will protect Eligible Whistleblowers who raise concerns in good faith. However, appropriate disciplinary action will be taken in accordance with the Performance Management and Disciplinary Policy and Procedure against any individual found to have made a disclosure maliciously, that they know to be untrue or against an individual who victimised another for reporting Reportable Conduct. This may result in the individual's employment being terminated.

5 INVESTIGATION PROCESS

5.1 Investigation guidelines generally

Investigations of reportable conduct will be carried out in a manner that is fair, objective and as far as is practicable, confidential. All information and documented evidence will be held securely and in the strictest confidence as far as is appropriate.

All reports received by an internal UPA officer in reference to this policy will be reported to the Whistleblower Protection Officer (WPO) and assigned by the Company Secretary to a Whistleblower Investigation Officer (WIO) appointed by the Company Secretary.

5.2 Reporting and Investigation Procedure

The procedure for reporting is:

- a) The Eligible Whistleblower may make the report in writing or verbally to the WPO.
- b) The report can be submitted directly to the WPO or through a line manager, Human Resources, a member of the UPA Senior Leadership team or the CEO. Alternatively, the individual may wish to report anonymously via the StopLine portal.
- c) The WPO will notify the Company Secretary who will appoint the WIO.

- d) The WIO will undertake an initial assessment of the report and determine whether there are grounds for a more detailed investigation to take place.
- e) Any person mentioned in the disclosure of the Reportable Conduct will be notified of the disclosure against them and will be given a fair opportunity to respond to the disclosure.
- f) The reporting individual may be asked to provide more information to assist with the investigation
- g) If deemed necessary after the initial assessment, the WIO will fully investigate the report, seeking additional information and evidence as required.

The WIO will act with total independence and will not be a person who in any way is implicated (directly or indirectly) in the allegation.

The WIO may be a UPA staff member or an external stakeholder as appropriate to the circumstances, and may be one of the following:

- a) A member of People and Culture
- b) A member of Senior Leadership team
- c) A member of the UPA Board of Directors
- d) An external investigator appointed by UPA

The role of the WIO is to investigate the substance of the report to determine whether there is evidence in support of the matter raised or, alternatively, to refute the report made.

UPA will aim to commence an investigation within two (2) weeks of receiving the initial report.

The WIO will provide their report to the WPO and the Company Secretary who will report a summary to the Board.

The Board or Executive may deem it necessary to engage a third party investigator or team of investigators in complex and/or urgent and/or high risk matters and/or obtain legal advice or refer the matter to UPA's insurer.

If the report is substantiated, appropriate action will be taken. This may involve activation of disciplinary procedures or may require notification to external authorities if criminal activity has taken place.

The Eligible Whistleblower will receive written notification of the outcome of the investigation. The outcome is likely to be one of the following:

- a) The allegation cannot be substantiated and thus no further action will be taken.
- b) Continuous improvement action has been taken to ensure the issue does not arise again. Note: the Eligible Whistleblower will not be advised of specific action taken against the person(s) involved as this may represent a confidentiality breach.
- c) The matter has been referred to the relevant authorities.

Note that if the report is made to an external party (e.g. ASIC) investigation of the matter will be managed by the external party and will not be subject to the prescriptions of this policy.

5.3 Step 1 – Receipt & Acknowledgement

The WPO records the disclosure, assesses prima-facie eligibility for protection, and provides written acknowledgement (where contact possible) within five working days.

5.4 Investigation pathway selection

A significant innovation in the new Aged Care Act is the dual pathway for managing disclosures.

The Rules allow a whistleblower to elect to have their disclosure managed under the complaints and feedback regime (s.165-35(3)), rather than the whistleblower stream.

This means that UPA's systems must include a clear triage process to determine, in consultation with the discloser where possible, whether an issue should proceed through:

Pathway 1 - the whistleblower stream (which prioritises anonymity and statutory protections under the Aged Care Act); or

Pathway 2 - the complaints stream (which emphasises open disclosure, consumer involvement, and restorative practices, without the whistleblower protections of anonymity); or

Pathway 3 - whistleblower complaints pathway under the Corporations Act for large proprietary companies and public companies, including public companies limited by guarantee (which prioritises anonymity and statutory protections under the Corporations Act).

A whistleblower may decide to use multiple pathways.

For example, a staff member who reports suspected financial misconduct may wish to remain anonymous and access whistleblower protections, while a resident's family member raising concerns about care quality may prefer the complaints process, which allows for more direct involvement in resolution.

Documenting the rationale for the chosen pathway is essential for transparency and accountability, and helps ensure that all parties understand their rights and the process.

5.5 Step 2 – Risk Assessment

Assess risk of Detriment to discloser and anyone named; implement mitigation.

5.6 Step 3 – Investigation Planning

WPO refers the matter via the channels as stated above to the Company Secretary who appoints an independent WIO (internal or external) as stated above and sets Terms of Reference.

5.7 Step 4 – Investigation

Evidence gathered confidentially; procedural fairness afforded to any person subject to adverse findings. Matters raising immediate health or safety risks will be escalated to the Commission and management without delay.

5.8 Step 5 – Outcome

WIO report submitted to WPO and Chief Executive / Board (excluding persons implicated). Findings summarised for discloser (subject to privacy).

5.9 Step 6 – Action & Continuous Improvement

Corrective and preventative actions implemented; incidents or breaches reported to regulators as required; systemic issues fed into quality improvement plan.

6 RECORDKEEPING AND REPORTING

- a) All disclosures, risk assessments, investigations and outcomes are logged in the confidential whistleblower register retained for seven years.
- b) De-identified statistics on number of disclosures, nature of issues and remedial actions are reported quarterly to the Quality Care Advisory Body and annually to the Board.
- c) Serious reportable incidents will be reported to the Commission in line with the Incident Management & Reporting Rules.

7 TRAINING AND AWARENESS

- a) All workers and governing-body members receive annual training on this policy, whistleblower rights, and how to recognise and report wrongdoing.
- b) The policy is provided to new starters, volunteers, contractors and displayed on the Provider's website and noticeboards in residential homes.

8 RESPONSIBILITIES

Roles	Responsibilities
UPA Board Responsibilities	<p>Endorse and oversee implementation and effectiveness of this policy.</p> <p>Approve the Policy, including any material variations.</p> <p>Review reports on the receipt and treatment of reports received by UPA about accounting, internal control, audit, compliance, and other matters about which individuals have concerns.</p> <p>Refer to the Risk Committee (RC) any matters that have come to the attention of the Board that are relevant to the RC.</p>
Financial Performance IT and Audit & Risk Committee (RC)	<p>Reviewing reports and referring to the Board any receipt and treatment of complaints received by UPA about risk and compliance matters about which Eligible Whistleblowers have concerns.</p> <p>Overseeing, implementing, and communicating the contents of this Policy, in relation to complaints about corporate and clinical governance.</p>
Chief Executive Officer	<p>The Chief Executive Officer is responsible for ensuring resources and culture support whistleblowing.</p>
People and Culture Team Responsibilities	<p>Monitoring the process for Whistleblowers and their protection under this Policy.</p> <p>Appropriately managing/coordinating complaints and investigation of complaints</p> <p>Overseeing, implementing, and communicating the contents of this Policy in relation to complaints made by or about staff.</p> <p>Ensuring that a copy of this Policy is available to all officers and employees of UPA online and in hard copy.</p>
Whistleblower Protection Officer (WPO)	<p>Receive disclosures, safeguard confidentiality, coordinate investigation, oversee protection from detriment, maintain register, fulfil reporting duties.</p> <p>Provide protection against retaliation to Eligible Whistleblowers who have or may report concerns.</p> <p>Oversee the Human Resource's protection monitoring process and reporting for Eligible Whistleblowers reporting concerns under this Policy.</p>
Whistleblower Investigations Officer	<p>Investigate reports received through whistleblowing channels.</p>

Roles	Responsibilities
	<p>Perform duties assigned to the WIO under the Investigation Guidelines.</p> <p>Update the Risk Committee and HR with their Investigation result in a timely manner, including providing feedback to the whistleblower through a relevant whistleblowing channel.</p>
Managers / Supervisors	Foster open, safe environment; forward any disclosure immediately to WPO; prevent victimisation.
All workers	All workers must comply with the Aged Care Code of Conduct; report suspected wrongdoing; maintain confidentiality.

9 BREACH

Breaches of this policy or the whistleblower provisions in the Aged Care Act, including retaliatory conduct or unauthorised disclosure of a whistleblower's identity, constitute serious misconduct and will attract disciplinary action, up to and including termination, and may be referred to police or the Commission.

10 REVIEW

The policy will be reviewed at least every two years, and earlier if legislative or organisational changes warrant. Consultation will include worker representatives, consumer advisory bodies and the Quality Care Advisory Body.

11 CONTACT DETAILS

Contact	Details
UPA Board	Board of UPA - UPA of NSW Ltd info@upa.org.au
Financial Performance IT and Audit & Risk Committee (also referred to as Audit & Risk Committee)	Board of UPA - UPA of NSW Ltd info@upa.org.au
People and Culture (Human Resources)	peopleculture@upa.org.au
Whistleblower Investigation Officer's Name	Hanna Myllyoja, General Counsel and Company Secretary or appointee Hanna.myllyoja@upa.org.au
Whistleblower Protection Officer's Name	Sandra Clubb, Director People & Culture Sandra.clubb@upa.org.au
STOP Line	1300 30 45 50

Contact	Details
Whistleblower Hotline Program	Whistleblower Hotline & Integrity Services (stopline.com.au)

12 SUPPORTING DOCUMENTATION

Type	Resource
Legislation	Legislation
Strengthened Standards	Strengthened Standards
Internal Documents	<p>Incident Management Policy</p> <p>Complaints and Feedback Policy</p> <p>Code of Conduct</p> <p>Work, health and safety policy</p> <p>UPA Conflict Resolution and Grievance Policy</p> <p>Performance Management and Disciplinary Process</p> <p>Where conflicts arise, this Whistleblower Policy prevails to the extent of any inconsistency.</p>
Other References	<p>Whistleblower Hotline Program - Whistleblower Hotline & Integrity Services (stopline.com.au)</p> <p>ASIC Regulatory Guide 270 - Whistleblower Policies</p>

13 VERSION CONTROL

Approved By	Board	New Review Date	08/12/2028
Version History	10/2025: Submitted for board approval. Board approved with pending inclusion of flowchart, which is to be endorsed by CEO.		

Whistleblower Policy - Pathway Diagram

