14.13.1 WHISTLEBLOWER PROCEDURE

1. PURPOSE

This Procedure outlines how Amana Living receives, manages, investigates and responds to Protected Disclosures and other whistleblower reports.

The Procedure supports the Whistleblower Policy and aims to ensure that disclosures are managed consistently, confidentially and fairly.

2. SCOPE

This Procedure applies to all persons covered by the Whistleblower Policy, including those making disclosures and those responsible for receiving, managing, investigating or responding to them.

Nothing in this Procedure limits or replaces mandatory reporting obligations under legislation or other reporting requirements applicable to Amana Living.

3. PROCEDURE STEPS

3.1. Reporting a Concern

Protected Disclosures may be made through:

- a Service Manager;
- an Operations Manager;
- a member of the Leadership Team;
- the Chief Executive Officer;
- a Board member;
- a Whistleblower Officer;
- the Whistleblower email address;
- an Aged Care Worker; or
- an external regulator or authorised body as permitted by law.

Anonymous disclosures may be submitted through any available reporting channel.

3.2. Receiving a Protected Disclosure

Any person who receives a Protected Disclosure must treat the information seriously and maintain confidentiality.

Where possible, the recipient should:

- listen carefully and respectfully;
- thank the person for raising the concern;
- avoid making judgements regarding the accuracy of the allegations;
- refrain from conducting their own investigation;
- explain that the matter will be referred to a Whistleblower Officer; and
- refer the disclosure to one of Amana Living's designated Whistleblower Officers while maintaining confidentiality.

Step 1 – Listen and Support

The Aged Care Worker should:

- listen respectfully and without judgement;
- thank the person for speaking up;
- avoid discouraging the disclosure; and

- avoid making promises regarding investigation outcomes.

Step 2 – Explain the Process

The Aged Care Worker should explain that:

- Amana Living takes whistleblower reports seriously;
- the information will be referred to a Whistleblower Officer for assessment;
- confidentiality will be maintained wherever possible; and
- the person may remain anonymous if they choose.

Step 3 – Record Relevant Information

Where appropriate, record:

- the nature of the concern;
- the date and time of the disclosure;
- the individuals involved;
- any immediate risks to residents, clients or others; and
- whether the person wishes to remain anonymous.

Step 4 – Escalate Promptly

The disclosure should be forwarded as soon as practicable to:

- the Chief People Officer; or
- the General Manager Health Care Quality.

Where there is an immediate risk to the safety, health or wellbeing of any resident, client, worker or member of the public, urgent action must be taken in accordance with applicable incident management and escalation procedures.

Step 5 – Maintain Confidentiality

The Aged Care Worker must not:

- discuss the disclosure with colleagues who do not have a legitimate need to know;
- attempt to investigate the matter independently;
- disclose the identity of the Whistleblower without lawful authority; or
- take any action that may result in victimisation or Detrimental Conduct.

The recipient must not disclose the identity of the Whistleblower except where authorised by law or with the Whistleblower's consent.

3.3. Training and Awareness

Amana Living is committed to ensuring employees, volunteers and contractors understand their rights and responsibilities under the Whistleblower Policy and Procedure.

Employees and Volunteers

Whistleblower awareness will be incorporated into:

- induction and onboarding programs;
- annual mandatory compliance training; and
- periodic awareness and communication activities.

Training will include:

- the purpose of whistleblower protections;
- how Protected Disclosures may be made;
- who may receive Protected Disclosures;

- confidentiality obligations;
- protections against victimisation and Detrimental Conduct; and
- responsibilities when receiving a disclosure.

Contractors and Agency Personnel

Contractors, labour hire personnel, agency staff and relevant service providers will be provided with information regarding:

- Amana Living's Whistleblower Policy and Procedure;
- available reporting pathways;
- confidentiality requirements;
- whistleblower protections; and
- escalation requirements.

Information may be provided through procurement processes, contract documentation, onboarding activities, induction programs or other communication methods.

Leadership Training

Managers, Responsible Persons and Executive Team members will receive additional guidance regarding:

- their responsibilities as eligible recipients;
- confidentiality obligations;
- managing disclosures appropriately;
- protection of Whistleblowers; and
- escalation and reporting requirements.

3.4. Communication and Promotion

Amana Living will actively promote a speak-up culture through regular communication activities.

These activities may include:

- CEO newsletters;
- staff meetings;
- volunteer communications;
- contractor and supplier communications;
- intranet publications;
- Amana Living's website; and
- training and awareness activities.

Communications will reinforce:

- the importance of speaking up;
- available reporting pathways;
- confidentiality protections;
- Amana Living's commitment to transparency and accountability; and
- the organisation's zero tolerance for victimisation, reprisals and Detrimental Conduct.

3.5. Initial Assessment

Upon receipt of a disclosure, the Whistleblower Officers will:

- acknowledge receipt where possible;
- assess whether the matter is a Protected Disclosure, grievance, complaint, reportable incident or another type of report;
- assess whether any immediate risks require urgent action;
- consider any obligations under relevant legislation; and

- determine the appropriate management and investigation pathway.

Where a matter does not qualify as a Protected Disclosure, it will be referred to the appropriate process while maintaining confidentiality where appropriate.

Initial assessment should generally occur within 24 hours of receipt.

3.6. Case Management

A secure case file will be established.

Records relating to whistleblower disclosures will be maintained separately from personnel, resident or client files.

Access will be restricted to individuals with a legitimate need to know.

3.7. Investigation

Where investigation is required:

- a suitably qualified investigator will be appointed;
- actual or perceived conflicts of interest will be avoided;
- investigations will be conducted fairly, objectively and confidentially;
- witnesses may be interviewed;
- documentary evidence may be reviewed; and
- findings will be evidence-based.

Investigations may be undertaken internally or externally depending on the nature, seriousness or sensitivity of the allegations.

3.8. Communication with the Whistleblower

Where contact details are available, the Whistleblower Officers will seek to keep the Whistleblower informed of:

- receipt of the disclosure;
- progress of the investigation;
- significant milestones;
- any support measures available; and
- the outcome of the matter, where legally permissible and appropriate.

3.9. Investigation Outcome

At the conclusion of the investigation, a report will be prepared outlining:

- the allegations;
- investigation methodology;
- evidence collected;
- findings;
- conclusions; and
- recommendations.

Recommendations may include:

- corrective actions;
- disciplinary action;
- process improvement initiatives;
- referral to a regulator;
- amendments to policies, procedures or training; or
- further investigation.

3.10. Whistleblower Protection Measures

The Whistleblower Officers will assess whether specific protection measures are required, including:

- confidentiality controls;
- welfare support;
- workplace adjustments;
- monitoring for Detrimental Conduct; and
- access to counselling, employee assistance or other support services.

Any allegation of Detrimental Conduct will be investigated as a priority matter.

3.11. Reporting to the Board

The Chair of the Board will be advised of any significant whistleblower matter as soon as reasonably practicable following preliminary assessment.

The Governance, People and Culture Committee will receive regular de-identified reporting on:

- disclosures received;
- investigations underway;
- substantiated matters;
- systemic issues identified; and
- actions taken in response.

An annual whistleblower report will be presented to the Board summarising:

- the number and categories of disclosures received;
- substantiated and unsubstantiated matters;
- matters under investigation;
- themes and trends;
- improvement actions implemented;
- whistleblower training completion rates; and
- communication and awareness activities undertaken during the reporting period.

Information reported to the Board will not identify a Whistleblower unless required by law or authorised by the Whistleblower.

4. ROLES AND RESPONSIBILITIES

Role	Responsibility
Whistleblower Officers	The Chief People Officer and General Manager Health Care Quality are Amana Living's designated Whistleblower Officers. They are responsible for: • receiving and assessing disclosures; • determining whether a matter falls within the scope of this Procedure; • determining the appropriate management and investigation pathway; • appointing investigators where required; • maintaining communication with Whistleblowers; • ensuring whistleblower protections are implemented; • monitoring the welfare of Whistleblowers; • keeping Whistleblowers informed of investigation progress and outcomes where appropriate; • providing updates to the Chief Executive Officer and Board as required; and • maintaining appropriate records.
Managers	Managers must: • support individuals who raise concerns; • protect confidentiality; • immediately escalate disclosures received; • ensure no Detrimental Conduct occurs; and • support implementation of any required protection measures.

5. RELATED DOCUMENTS

- 14.13 Whistleblower Policy

Amana Living

CONTROLLED DOCUMENT – RECORD OF APPROVAL

Printed copies of this document are regarded as uncontrolled. For the latest version go to the "Document Location" in the table below.

DOCUMENT DETAILS

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REVIEW TIMEFRAME AND RESPONSIBILITY

This policy will be reviewed by the author or responsible department prior to the Date Due for Review displayed below.

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