



Trilogy Care Whistleblower Policy and Procedure

Contents

Trilogy Care Whistleblower Policy.....	2
Trilogy Care Whistleblower Procedure	4
Review Dates.....	6



Trilogy Care Whistleblower Policy

Purpose

This policy outlines Trilogy Care's commitment to encouraging the reporting of Reportable Conduct and protecting those who make disclosures. It incorporates the requirements of the Aged Care Act 2024, the Corporations Act 2001, and other applicable laws.

Trilogy Care is committed to fostering a culture of integrity, accountability and transparency and promoting a safe environment in which concerns can be raised without fear of reprisal.

Scope

This policy applies to current and former employees; contractors, suppliers and consultants; volunteers and trainees; board members; family members of clients and clients themselves; individuals in the community interacting with our services.

All whistleblowers are protected under this policy, including individuals raising concerns externally to designated regulatory bodies.

Whistleblower Protection

Trilogy Care prohibits any form of retaliation or Detrimental Conduct against whistleblowers. These protections include (a) Confidentiality of identity, (b) Immunity from civil, criminal or administrative liability, (c) Protection from workplace victimisation including Dismissal or demotion; Harassment, bullying or intimidation; Damage to reputation or property or psychological harm.

Confidentiality

Disclosures may be made anonymously. Anonymous reports will still be investigated to the extent practicable. Where a whistleblower chooses to identify themselves, their identity will only be shared with consent.

Accessibility of this Policy

This policy will be available in (a) Plain English (b) Easy-read or translated formats upon request or (c) Formats suitable for people with disabilities. *(This policy is available in accessible formats. If you require this document in a different format such as large print, Easy Read, audio, or translated language, please contact the Company).*

Trilogy Care will promote awareness of this policy to staff, volunteers, contractors, clients and their families.

Review of Policy

The policy will be reviewed regularly to ensure compliance with changes in legislation, including aged care governance requirements.

Applicable Legislation

Aged Care Act 2024

Corporations Act 2001

Trilogy Care Whistleblower Procedure

Purpose

This procedure outlines Trilogy Care's commitment to encouraging the reporting of Reportable Conduct and protecting those who make disclosures. It incorporates the requirements of the Aged Care Act 2024, the Corporations Act 2001, and other applicable laws.

Trilogy Care is committed to fostering a culture of integrity, accountability and transparency and promoting a safe environment in which concerns can be raised without fear of reprisal.

Scope

This procedure applies to current and former employees; contractors, suppliers and consultants; volunteers and trainees; board members; family members of clients and clients themselves; individuals in the community interacting with our services

All whistleblowers are protected under this policy, including individuals raising concerns externally to designated regulatory bodies.

Procedure

1.0 Reportable Conduct

1.1 Reportable Conduct includes (but is not limited to):

- 1.1.1 Neglect, abuse or mistreatment of a client
- 1.1.2 Breaches of the Strengthened Aged Care Quality Standards
- 1.1.3 Serious health or safety risks to clients
- 1.1.4 Fraud, misuse of government funding or subsidies
- 1.1.5 Discrimination, harassment or bullying
- 1.1.6 Unethical, illegal or corrupt conduct
- 1.1.7 Cover-ups of any of the above

2.0 How to Make a Disclosure

2.1 In maintaining a culture of honest and ethical behaviour, if an individual becomes aware of any Reportable Conduct, it is expected that the individual will make a disclosure under this policy and procedure. There are several ways that the individual may wish to disclose or report.

2.2 Internal Reporting Channels

2.2.1 Disclosures may be made to Whistleblower Protection Officers:

- a) Head of People & Culture
 - i. Hanno Nieuwoudt
 - ii. 07 2112 3670
 - iii. hannon@trilogycare.com.au
- b) Chief Executive Officer
 - i. Luke Traini
 - ii. luket@trilogycare.com.au

2.2.2 Outside business hours, disclosures may be made via email.

2.2.3 Individuals are also encouraged to contact the Whistleblower Protection Officers to obtain any additional information you may require before making a disclosure or for any clarification regarding this policy or procedure.

2.3 External Reporting Channels

2.3.1 Whistleblowers may also disclose concerns to:

- a) [Aged Care Quality and Safety Commission \(ACQSC\)](#)
- b) [Australian Securities and Investments Commission \(ASIC\)](#)
- c) [Australian Prudential Regulation Authority \(APRA\)](#)
- d) A legal practitioner, for the purpose of obtaining legal advice
- e) A journalist or Member of Parliament, in certain public interest or emergency situations

2.3.2 Public interest or emergency disclosures must meet legal requirements (e.g. prior disclosure to ASIC/APRA, sufficient time lapse, imminent risk to health/safety).

3.0 Whistleblower Investigation Process

3.1 All disclosures will be investigated promptly, fairly, and confidentially.

3.1.1 If the discloser is known, the Whistleblower Protection Officer will maintain regular contact and provide updates on progress.

3.2 Persons against whom allegations are made will be informed (unless there are legal or ethical restrictions) and given a chance to respond.

Review Dates

Version No.	Review Date	Document Owner
V1.0	20/2/2025	People and Culture
V2.0	24/6/2025	Head of People and Culture and Chief Executive Officer
V3.0	December 2025	Pending Review