

TC-007 Whistleblower Policy and Procedure



Objective and Purpose

Trilogy Care actively encourages feedback and complaints from clients, families, staff, contractors, and the public, and these are managed respectfully, confidentially, and fairly.

This policy provides an additional, specialised pathway for raising serious concerns about misconduct, integrity, governance, or systemic risks, particularly where a person does not feel safe using standard channels or where legal protections may apply.

The policy ensures that:

- Stakeholders can report concerns without fear of retaliation
- Reports are handled independently, fairly, and promptly
- Legal and regulatory protections for whistleblowers are upheld
- Systemic issues are identified and addressed to protect clients, staff, and the organisation

Applicability and Audience

This policy applies to all individuals who interact with Trilogy Care, including:

- Current and former staff members
- Contractors and suppliers
- Clients receiving services
- Families and authorised representatives
- Members of the public

Core Principles

Accessibility	Multiple reporting channels are available (webform, phone, postal mail)
Confidentiality	Identities are protected wherever possible. Anonymous disclosures are accepted
Non-Retaliation	No person will be disadvantaged, dismissed, demoted, harassed, intimidated, or discriminated against for raising concerns in good faith. Retaliation is a serious breach and may result in disciplinary action, including termination

Independence	Reports are handled independently with appropriate governance oversight
Integration	Routine complaints and feedback processes remain available for everyday service issues
Protections for Whistleblowers	<ul style="list-style-type: none"> • Identity confidentiality maintained throughout • Protection from retaliation or adverse action • Legal protections under the <i>Corporations Act 2001</i> (Cth) and <i>Aged Care Act 2024</i> • Right to remain anonymous • Access to support services

Procedure

Decision Framework: Whistleblower vs Complaint

Factor	Whistleblower / Protected Disclosure	Complaint
Purpose	Raise serious misconduct, unethical behaviour, or governance risks	Resolve routine service or care issue
Issue Type	Fraud, corruption, breach of law/policy, systemic risk	Minor, isolated concerns
People Involved	Senior staff, leadership, multiple parties	Frontline staff or service processes
Reporter's Situation	Fear of retaliation, sensitive or complex issue	Comfortable using complaints process
Risk to Clients / Staff / Company / Others	Potential or actual harm	Low or negligible

If you are unsure, treat the concern as Whistleblower initially (submit via the whistleblower process) and it will be triaged appropriately and redirected to complaints if it is not a whistleblower/protected disclosure.

How to Report a Concern

Online		Visit our website and complete the form: www.trilogycare.com.au/whistleblower
Phone		Call our dedicated “Speak Up” line: 1300 598 813 That this is a voicemail service and is <u>only</u> available for whistleblower disclosures. When you call, follow the instructions and leave details of your concern
Post		<p>Write to us with details of your concern</p> <p>Post to:</p> <p><i>Trilogy Care</i> <u>PRIVATE & CONFIDENTIAL</u> <i>Attention: Speak Up: Whistleblower & Protected Disclosure</i> <i>Protected Disclosures Officer</i> <i>Level 3</i> <i>2 King Street</i> <i>Bowen Hills, QLD 4006</i></p>

We accept all anonymous reports. However, you may wish to consider providing a secure email address or pseudonym to enable confidential communication for updates and clarification.

What Information to Share

What we need to know	OPTIONAL information you may opt to share
<ul style="list-style-type: none">• Details of the concern• Which of the following the concern relates to:<ul style="list-style-type: none">◦ Fraud, corruption, or misuse of resources◦ Breach of law, regulation, or company policy◦ Misconduct or unethical behaviour◦ Governance failures◦ Systemic risks affecting clients, staff, or services	<ul style="list-style-type: none">• Relationship with Trilogy Care (e.g. Client, Supplier, Member of Public, Current Staff, Past Staff)• When this occurred• Where this occurred• If you would like to be contacted, details of how we should contact you (e.g. name or pseudonym, secure email or phone number)• Any documents or evidence that are relevant to share in relation to the concern.

What Happens After You Report

1. Receipt & Logging	Report received and logged securely with unique case ID
2. Acknowledgement	Within 3 business days (if contact details provided)
3. Triage & Assessment	Initial assessment within 5 business days to: <ul style="list-style-type: none">• Determine if whistleblower protections apply• Assess urgency and risk level• Identify if immediate action required
4. Escalation	If your concern involves immediate danger to clients or staff, it will be escalated immediately to management, safeguarding, or emergency services
5. Investigation	Independent, fair investigation conducted. High risk matters or those involving senior staff may involve external investigators. Conflict-of-interest checks conducted before allocation.
6. Action & Resolution	Corrective actions implemented, systemic issues addressed, process improvements identified
7. Communication	Updates provided where possible without compromising confidentiality. Ongoing monitoring for retaliation
8. Reporting	De-identified quarterly reports submitted to Executive Leadership, Care Quality & Compliance Committee, and Board

Legal and regulatory framework

Aged Care Act 2024

Strengthened Aged Care Quality Standards (Nov 2025)

Aged Care Quality and Safety Commission

Statement of Rights 2024

Related documents

Feedback and Complaints Policy

Privacy and Confidentiality Policy and Procedure

Appendix 1 – Definition of terms

Term	Definition
Whistleblower (Protected Discloser)	A person who reports information about misconduct, improper conduct, or risks to the public interest within Trilogy Care. The whistleblower must have a reasonable belief that the information concerns serious wrongdoing
Disclosable Conduct	<p>Serious wrongdoing</p> <p>Including:</p> <ul style="list-style-type: none"> • Fraud, corruption, or misuse of resources • Breach of law, regulation, or company policy • Misconduct or unethical behaviour • Governance failures • Systemic risks affecting clients, staff, or services <p>Examples:</p> <ul style="list-style-type: none"> ○ <i>Falsifying records or timesheets</i> ○ <i>Mis-using client funds</i> ○ <i>Unsafe work practices</i> ○ <i>Privacy breaches</i> ○ <i>Cover-ups or failure to report incidents</i>
Retaliation	Any adverse action taken against a person for making a disclosure in good faith, including dismissal, demotion, harassment, intimidation, or discrimination
Anonymous Disclosure	A report made without identifying the reporter

Appendix 2 – Roles and Responsibilities

Role	Responsibilities
All Staff, Contractors, and Stakeholders	<ul style="list-style-type: none"> Report suspected misconduct or wrongdoing in good faith Maintain confidentiality of any disclosures Cooperate with investigations Do not engage in retaliation
Managers and Supervisors	<ul style="list-style-type: none"> Foster a culture where concerns can be raised safely Do not discourage or prevent reporting Maintain confidentiality Monitor for and report any retaliation
Care, Quality & Compliance Committee	<ul style="list-style-type: none"> Receive and log all disclosures securely Acknowledge receipt within 3 business days (if contact details provided) Conduct initial assessment within 5 business days Maintain confidentiality and anonymity Monitor for retaliation Conduct fair, independent, and timely investigations Maintain confidentiality Document findings and recommendations Identify systemic issues Provide governance oversight Review de-identified quarterly reports Monitor systemic risks and trends Ensure independence and accountability
Executive Leadership	<ul style="list-style-type: none"> Ensure policy implementation and compliance Review investigation outcomes Implement corrective actions Receive de-identified quarterly reports
Board	<ul style="list-style-type: none"> Receive de-identified reports on whistleblower activity Ensure organisational accountability

Document revision history

Author / subject matter expert	General Manager Quality & Operations
Custodian	Chief Quality & Operations Officer
Risk Rating	Moderate
Compliance evaluation and audit (monitoring and review)	<ul style="list-style-type: none">Provide monthly updates to teams and executive, detailing the number of complaints resolved and those outstanding for more than 28 days.Conduct a quarterly review of complaint and remediation trends to identify areas for improvement, such as staff training and system enhancements.
Replaces document/s	New document
Changes to practice from previous version	New document
Education and training to support implementation	Documents provided on SharePoint; each department will provided training on complaints and remediation module
Consultation	Chief Quality & Operation Officer Chief Care & Clinical Officer Head of Clinical Governance General Manager – Quality & Assurance
Marketing strategy	Communication via TEAMS channels, internal SharePoint platform and via personalised emails to staff
Key words	Remediation, Complaint resolution, Accountable Person, CRM (Customer Relationship Management), Escalation Trigger, Advisory Service, Action Plan, Consolidated Complaint, Communication Escalation Framework

Authorisation

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