

## 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

<b>Accessibility</b>	Multiple reporting channels are available (webform, phone, postal mail)
<b>Confidentiality</b>	Identities are protected wherever possible. Anonymous disclosures are accepted
<b>Non-Retaliation</b>	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

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




## Procedure

### Decision Framework: Whistleblower vs Complaint

Factor	Whistleblower / Protected Disclosure	Complaint
<b>Purpose</b>	Raise serious misconduct, unethical behaviour, or governance risks	Resolve routine service or care issue
<b>Issue Type</b>	Fraud, corruption, breach of law/policy, systemic risk	Minor, isolated concerns
<b>People Involved</b>	Senior staff, leadership, multiple parties	Frontline staff or service processes
<b>Reporter's Situation</b>	Fear of retaliation, sensitive or complex issue	Comfortable using complaints process
<b>Risk to Clients / Staff / Company / Others</b>	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		<p><b>Visit our website and complete the form:</b>  <a href="http://www.trilogycare.com.au/whistleblower">www.trilogycare.com.au/whistleblower</a></p>
Phone		<p><b>Call our dedicated “Speak Up” line: 1300 598 813</b></p> <p>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</p>
Post		<p>Write to us with details of your concern</p> <p><b>Post to:</b></p> <p><i>Trilogy Care</i></p> <p><b><i>PRIVATE &amp; CONFIDENTIAL</i></b></p> <p><i>Attention: Speak Up: Whistleblower &amp; Protected Disclosure</i></p> <p><i>Protected Disclosures Officer</i></p> <p><i>Level 3</i></p> <p><i>2 King Street</i></p> <p><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 <u>may</u> opt to share
<ul style="list-style-type: none"> <li>• Details of the concern</li> <li>• Which of the following the concern relates to: <ul style="list-style-type: none"> <li>○ Fraud, corruption, or misuse of resources</li> <li>○ Breach of law, regulation, or company policy</li> <li>○ Misconduct or unethical behaviour</li> <li>○ Governance failures</li> <li>○ Systemic risks affecting clients, staff, or services</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Relationship with Trilogy Care (e.g. Client, Supplier, Member of Public, Current Staff, Past Staff)</li> <li>• When this occurred</li> <li>• Where this occurred</li> <li>• If you would like to be contacted, details of how we should contact you (e.g. name or pseudonym, secure email or phone number)</li> <li>• Any documents or evidence that are relevant to share in relation to the concern.</li> </ul>

## What Happens After You Report

<b>1. Receipt &amp; Logging</b>	Report received and logged securely with unique case ID
<b>2. Acknowledgement</b>	Within 3 business days (if contact details provided)
<b>3. Triage &amp; Assessment</b>	Initial assessment within 5 business days to: <ul style="list-style-type: none"><li>• Determine if whistleblower protections apply</li><li>• Assess urgency and risk level</li><li>• Identify if immediate action required</li></ul>
<b>4. Escalation</b>	If your concern involves immediate danger to clients or staff, it will be escalated immediately to management, safeguarding, or emergency services
<b>5. Investigation</b>	Independent, fair investigation conducted. High risk matters or those involving senior staff may involve external investigators. Conflict-of-interest checks conducted before allocation.
<b>6. Action &amp; Resolution</b>	Corrective actions implemented, systemic issues addressed, process improvements identified
<b>7. Communication</b>	Updates provided where possible without compromising confidentiality. Ongoing monitoring for retaliation
<b>8. Reporting</b>	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
<b>Whistleblower (Protected Discloser)</b>	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
<b>Disclosable Conduct</b>	<p>Serious wrongdoing</p> <p>Including:</p> <ul style="list-style-type: none"> <li>• Fraud, corruption, or misuse of resources</li> <li>• Breach of law, regulation, or company policy</li> <li>• Misconduct or unethical behaviour</li> <li>• Governance failures</li> <li>• Systemic risks affecting clients, staff, or services</li> </ul> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>○ <i>Falsifying records or timesheets</i></li> <li>○ <i>Mis-using client funds</i></li> <li>○ <i>Unsafe work practices</i></li> <li>○ <i>Privacy breaches</i></li> <li>○ <i>Cover-ups or failure to report incidents</i></li> </ul>
<b>Retaliation</b>	Any adverse action taken against a person for making a disclosure in good faith, including dismissal, demotion, harassment, intimidation, or discrimination
<b>Anonymous Disclosure</b>	A report made without identifying the reporter

## Appendix 2 – Roles and Responsibilities

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

## Document revision history

<b>Author / subject matter expert</b>	General Manager Quality & Operations
<b>Custodian</b>	Chief Quality & Operations Officer
<b>Risk Rating</b>	Moderate
<b>Compliance evaluation and audit (monitoring and review)</b>	<ul style="list-style-type: none"> <li>• Provide monthly updates to teams and executive, detailing the number of complaints resolved and those outstanding for more than 28 days.</li> <li>• Conduct a quarterly review of complaint and remediation trends to identify areas for improvement, such as staff training and system enhancements.</li> </ul>
<b>Replaces document/s</b>	New document
<b>Changes to practice from previous version</b>	New document
<b>Education and training to support implementation</b>	Documents provided on SharePoint; each department will provided training on complaints and remediation module
<b>Consultation</b>	Chief Quality & Operation Officer Chief Care & Clinical Officer Head of Clinical Governance General Manager – Quality & Assurance
<b>Marketing strategy</b>	Communication via TEAMS channels, internal SharePoint platform and via personalised emails to staff
<b>Key words</b>	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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 Date 16/01/2026

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 Date 16/01/2026