

WHISTLEBLOWER POLICY

This policy is aligned with the Aged Care Act 2024 (Commenced 1 November 2025)

1. Purpose

The purpose of this Policy is to support a safe, transparent and accountable environment for reporting misconduct. It ensures compliance with the Aged Care Act 1997, the Aged Care Quality Standards, and relevant Commonwealth whistleblower protections.

The purpose is to:

- Protect care recipients, families, employees, volunteers and contractors.
- Encourage the reporting of conduct that may be illegal, unethical, or a breach of the law, including the Aged Care Act 2024.
- Ensure that any person who makes a disclosure (a Whistleblower) can do so safely, securely, and confidentially without fear of victimisation, reprisal, or detriment.
- Establish a clear process for receiving, investigating, and acting upon protected disclosures.
- Strengthen our commitment to safe and high-quality aged care.

2. Who is Protected? (Eligible Whistleblowers)

Protection is provided to any individual who makes a protected disclosure, including:

- Altaira Staff: Current and former employees, officers, and contractors (including on-hire aged care workers).
- Aged Care Recipients: Older people receiving care, their families, and carers who have dealings with Altaira or the workers it places.
- Other Related Parties: Volunteers, suppliers of goods or services, associates of Altaira, and their relatives or dependents.

3. What is a Protected Disclosure? (Qualifying Disclosure)

A disclosure qualifies for protection under the Aged Care Act 2024 if the Whistleblower has reasonable grounds to suspect that the information indicates a breach or intended breach of the

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Aged Care Act by an entity (including Altaira, its responsible persons, or the aged care workers it places).

This includes, but is not limited to, concerns about:

- Breaches of the Aged Care Act 2024 or Aged Care Quality Standards, including neglect, abuse, substandard care.
- Substandard care, elder abuse, or neglect by an aged care worker placed by Altaira.
- Failure to meet the Aged Care Quality Standards or the Aged Care Code of Conduct.
- Illegal or dishonest conduct (e.g., fraud, financial misconduct, or misappropriation of funds).
- Misconduct or an improper situation or circumstances involving Altaira.
- Harm or danger to the health, safety, or well-being of older persons.

Note: A disclosure must be made in good faith and on reasonable grounds. A discloser is protected even if the concern turns out to be incorrect, if they had reasonable grounds to suspect wrongdoing.

4. How to Make a Disclosure (Eligible Recipients)

A protected disclosure can be made anonymously or with identity disclosed. It can be made in writing or verbally.

Internal Recipients:

Within Altaira, you can report your concerns to an "eligible recipient" who will handle the matter in line with this Policy.

1. Altaira Whistleblower Protection Officer (WPO) / Human Resources Manager (Primary internal contact).
2. Responsible Person (Director, Head of Compliance and Education).

External Recipients (as per Aged Care Act 2024):

A disclosure is also protected if made to external bodies, which are considered "eligible recipients" under the new Act:

- Aged Care Quality and Safety Commission (including the Complaints Commissioner).

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- Commonwealth Department of Health, Disability and Ageing.
- A Police Officer.
- An Independent Aged Care Advocate (e.g., via the Older Persons Advocacy Network - OPAN).
- Commonwealth Ombudsman

5. Roles and Responsibilities of the Whistleblower Protection Officer (WPO)

The WPO is the primary internal contact responsible for ensuring the integrity and effectiveness of Altaira’s Whistleblower System, in line with the Aged Care Act 2024 requirements.

Responsibility Area	WPO Obligations
Receipt and Triage	Immediately acknowledge and record the disclosure. Assess whether the matter constitutes a Protected Disclosure under this Policy or should be managed as a general complaint/feedback and document the rationale for the decision.
Confidentiality	MANDATORY: Take all reasonable steps to protect the identity of the Whistleblower, including redacting identifying information from documents and limiting access strictly to those involved in the investigation.
Anonymity	If the Whistleblower requests anonymity, take all reasonable steps to preserve it throughout the investigation process. The WPO is responsible for being the secure, non-identifying communication channel.
Protection from Detriment	Monitor the Whistleblower’s employment/engagement (if they are a staff member) for any signs of actual or threatened detrimental conduct. Immediately intervene and initiate disciplinary action if victimisation is suspected.
Investigation Management	Appoint a qualified, objective, and impartial internal or external investigator. Oversee the investigation to ensure it is conducted promptly, fairly, and adheres to principles of natural justice and procedural fairness.
Communication	Where the Whistleblower is identifiable and consents, provide them with updates on the investigation process, including when it has commenced, while it is in progress, and when it is finalised (subject to legal and privacy constraints).

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Record Keeping	Maintain secure, confidential, and accurate records of all disclosures, investigations, outcomes, and corrective actions taken.
Training & Review	Ensure all relevant staff (including aged care workers placed by Altaira) are trained on this Policy and the protections afforded by the Aged Care Act 2024.

6. Whistleblower Protections and Support

Altaira is committed to providing the full protections afforded under the law.

A. Protection from Detriment / Victimisation

Altaira will not tolerate, and may take disciplinary action against, any person who engages in, or threatens to engage in, detrimental conduct against a Whistleblower.

- Detrimental Conduct includes, but is not limited to dismissal, injury in employment, alteration of duties to the Whistleblower's disadvantage, discrimination, harassment, or harm (including psychological harm).
- A Whistleblower who suffers detriment because of their disclosure may be entitled to seek compensation and other legal remedies through the courts.

B. Confidentiality and Anonymity

- Identity Protection: Altaira will protect the identity of a Whistleblower. The identity, and information likely to reveal their identity, must not be disclosed unless one of the limited legal exceptions applies (e.g., with the discloser's consent, to a court or tribunal, or as necessary to prevent a serious threat to a person).

C. Immunity from Liability

A protected disclosure provides the Whistleblower with immunity from:

- Civil, criminal, or administrative liability (e.g., disciplinary action for breach of contract, or defamation) regarding the disclosure itself.

7. Handling and Investigation Process

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All disclosures will be investigated promptly, fairly, and objectively. All documents and records relating to the disclosure will be stored securely and confidentially. Corrective and disciplinary actions will be taken where allegations are substantiated.

8. Policy Review

This Policy will be reviewed at least every two years, or sooner if required by legislative changes (e.g., amendments to the Aged Care Act 2024 or the Aged Care Rules).

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