

Purpose

This policy is designed to uphold the principles of **transparency, accountability, and consumer safety** in accordance with the **Aged Care Act 2024**, the **Aged Care Quality Standards**, and other applicable legislation. It supports the protection of individuals who disclose serious wrongdoing related to the provision of **aged care and community transport services**, particularly under **CHSP funding**.

Those who make a report can do so confidently and without fear of intimidation, disadvantage or reprisal. Their confidentiality is guaranteed.

Scope of the Policy

This policy applies to any person with a connection to the organisation, including:

- Employees
- Volunteers
- Contractors and subcontractors
- All service recipients
- Board members and management
- Consultants and suppliers

It covers any activities undertaken as part of **aged care and community transport services** funded under CHSP or other government programs including ACVVS.

Definitions

Whistleblower: A person who discloses reportable conduct in accordance with this policy.

Reportable Conduct: Includes but is not limited to:

- Neglect or abuse of aged care recipients
- Serious misconduct
- Breach of the Aged Care Quality Standards
- Criminal offences or regulatory breaches
- Fraud, corruption, or financial misconduct
- Detriment to a person for raising a concern

Detriment: Includes dismissal, demotion, harassment, intimidation, discrimination, or any harm.

Policy Statement

At **Linked Community Services** we are committed to the highest standards of ethical conduct, transparency, and accountability in the delivery of community transport and aged care services under the **Commonwealth Home Support Programme (CHSP)** and **ACVVS**.

This **Whistleblower Policy** forms a critical component of our governance framework and reflects our obligations under the **Aged Care Act 2024**, the **Aged Care Quality Standards**, and relevant Commonwealth legislation including the **Corporations Act 2001**. It enables individuals to raise concerns about suspected misconduct, abuse, negligence, fraud, or unsafe practices without fear of reprisal.

We recognise the right and responsibility of staff, volunteers, service users, carers, contractors, and community members to speak up when they witness conduct that risks the wellbeing, dignity, or rights of older Australians in our care.

All disclosures made under this policy will be handled fairly, confidentially, and with a strong commitment to protecting the whistleblower from any form of detriment. The Board and leadership of Linked Community Services support a culture of openness where concerns are acknowledged and addressed to ensure safe, lawful, and person-centred care.

We are accountable to the people we serve—and we are proactive in ensuring any wrongdoing is promptly identified, reported, and addressed.

Guiding Principles

- Integrity and Accountability**
 We are committed to the highest standards of ethical behaviour. All allegations of misconduct or unethical behaviour will be treated seriously and investigated appropriately, regardless of the source.
- Consumer-Centred Care**
 Concerns that may affect the safety, rights, or dignity of aged care service users—particularly vulnerable CHSP recipients—will be prioritised and acted upon without delay.
- Protection from Reprisal**
 Whistleblowers will be protected from dismissal, discrimination, harassment, or any form of retaliation. This protection applies even if a disclosure turns out to be mistaken, provided it was made in good faith.
- Confidentiality**
 All reports and investigations will be handled with strict confidentiality to protect the identity of the whistleblower and others involved, except where disclosure is legally required.
- Accessibility and Inclusion**
 Reporting mechanisms will be easy to access and inclusive of people with diverse backgrounds, literacy levels, and communication needs, including older people and those from CALD or Aboriginal and Torres Strait Islander communities.
- Good Faith Reporting**
 Disclosures should be made with honest and reasonable belief that the information is true or may indicate misconduct. Malicious or knowingly false reports may result in disciplinary action.
- No Wrong Door Approach**
 Anyone—staff, volunteers, service users, or members of the public—can raise concerns via multiple reporting channels. We will not ignore or dismiss concerns, regardless of how they are raised.
- Fair and Timely Investigations**
 All disclosures will be assessed promptly, investigated impartially, and resolved fairly. Investigations will focus on facts, and procedural fairness will be extended to all parties involved.
- Leadership Commitment**
 The Board, CEO, and leadership team are committed to supporting whistleblowers and modelling a speak-up culture. Retaliation will not be tolerated and will be met with strong organisational response.
- Continuous Improvement**
 Reports made under this policy will be used as opportunities to improve systems, governance, and service delivery. Trends and risks identified through whistleblower disclosures will inform our quality and safety initiatives.

Responsibilities

Role	Responsibility
Board	Ensure oversight and compliance
Chief Executive Officer	Promote awareness and reporting culture
WPO	Receive and manage disclosures; protect whistleblowers
All Staff	Report misconduct and uphold the policy

Policy Protocols

1. Reportable Conduct

The following types of conduct can be reported under this policy:

- Abuse or neglect of aged care recipients
- Breaches of the Aged Care Quality Standards
- Misuse or mismanagement of CHSP funds
- Fraud, corruption, or theft
- Unsafe transport practices or negligence
- Reprisals against a person for raising concerns
- Unlawful, unethical, or serious misconduct

Reports may relate to actions by individuals, groups, or systemic issues in service delivery.

2. Making a Report

Whistleblowers can report concerns to:

Internal Contacts

- **Whistleblower Protection Officer (WPO):** David Paff dpaff@linked.org.au
- **CEO or General Manager**
- **Chairperson of the Board**

External Reporting Options

- **Aged Care Quality and Safety Commission (ACQSC):**
www.agedcarequality.gov.au | 1800 951 822
- **Australian Securities and Investments Commission (ASIC)**
- **Australian Charities and Not-for-profits Commission (ACNC)**
- **Local Police or other regulatory authorities**

Reports may be made:

- In person
- In writing (email or letter)
- Via anonymous submission (if desired)

3. Rights and Protections for Whistleblowers

Legal Protections under the Aged Care Act 2024 and Corporations Act 2001:

- Protection of identity and confidentiality
- Immunity from civil, criminal, or administrative liability
- Protection from dismissal or disciplinary action
- Protection against threats, bullying, or victimisation

Breaches of whistleblower protections may result in civil penalties for individuals or the organisation.

4. Investigation Process

Upon receipt of a report:

1. The matter will be assessed by the WPO or a designated senior officer.
2. A formal investigation will be conducted, where appropriate.
3. Outcomes may include disciplinary action, system improvements, or referral to regulators.
4. Whistleblowers may be informed of investigation outcomes where appropriate and possible.

All investigations will maintain strict confidentiality and fairness.

5. Confidentiality

All disclosures and investigations will be managed with discretion. Identifying information will only be shared:

- With consent from the whistleblower
- When required by law
- To prevent serious risk to health, safety, or welfare

6. Breach of Policy

Any retaliation or breach of this policy is considered serious misconduct and may result in disciplinary action, including termination of employment or contract.

7. Training and Awareness

- Staff and volunteers will be inducted into this policy.
- Regular training will be provided.
- The policy will be available on the organisation's website and at reception.

8. Review

This policy will be reviewed annually or in response to legislative changes, including updates from the **Department of Health, Disability and Aged Care** or the **ACQSC**.

Linked Community Services will also review this Whistleblower Protection policy, processes and procedures annually, ensuring that they reflect the most up-to-date legal and corporate governance requirements. Any changes made to the policy will be communicated to all Stakeholders

Related Policy, Procedures & Documents

Disputes Resolution Policy

Confidentiality Policy

Feedback & Complaints Policy

The Corporations Act 2001

Aged Care Act 2024

Related Legislation:

- The Aged Care Bill 2024
- Corporations Act 2001 (Cth) (Corporations Act)
- Taxation Administration Act 1953 (Cth)
- Australian Securities and Investments Commission Act 2001
- Superannuation Industry (Supervision) Act 1993
- The Fair Work Act 2009

Relevant Standard

Aged Care Quality Standards

1. The Individual
2. The Organisation