

Purpose

CatholicCare Sydney (**CatholicCare**) provides a safe, confidential and accessible framework so that concerns can be raised or disclosures made regarding actual or suspected unethical, unlawful or undesirable conduct.

CatholicCare is committed to:

- encouraging the reporting of wrongdoing,
- protecting whistleblowers from detriment or retaliation, and
- responding appropriately to disclosures to uphold safety, quality, integrity and compliance.

This policy, together with the Whistleblower Procedure, details:

- how to report suspected wrongdoing within CatholicCare;
- how those disclosures will be managed; and
- which reports will be regarded as Whistleblower disclosures.

Definitions

| | |
|--------------------|--|
| Eligible Person | <p>Any person who is, or has been, any of the following:</p> <ul style="list-style-type: none"> • an officer of CatholicCare Sydney • an employee of CatholicCare Sydney (including employees, contractors, consultants, volunteers) • an individual who supplies services or goods to CatholicCare Sydney (whether paid or unpaid) • an employee of a person that supplies services or goods to CatholicCare Sydney (whether paid or unpaid) • an individual who is an associate of CatholicCare Sydney • CatholicCare clients • a relative or carer of an individual listed above, or a dependent of an individual listed above such as an individual's spouse • any other person who has reasonable grounds to suspect wrongdoing connected with the organisation |
| Eligible Recipient | <p>The following are Eligible Recipients for the purposes of this policy:</p> <ul style="list-style-type: none"> • STOPline - an independent and specialised reporting service to facilitate anonymous reporting: <ul style="list-style-type: none"> ○ Phone: 1300 30 45 50 ○ Email: catholiccare@stopline.com.au ○ Online Portal: http://catholiccare.stoplinereport.com; or • CatholicCare's external auditors • ASIC, APRA, or ACNC in accordance with any relevant law or regulation • members of the CatholicCare Executive Leadership Team • the CEO or any person acting in that role • members of the Board |

| | |
|--------------------------|--|
| | <ul style="list-style-type: none"> • Internal audit within CatholicCare • a police officer • For disclosures relating to Aged Care: <ul style="list-style-type: none"> ○ CatholicCare employees ○ Department of Health, Disability and Ageing ○ Aged Care Quality and Safety Commission ○ An independent aged care advocate ○ The Trustees of Catholic Aged Care Sydney (where it is the registered provider of Aged Care services provided by CatholicCare) |
| Disclosure Coordinator | The person within CatholicCare responsible for managing whistleblower reports, coordinating investigations, maintaining confidentiality, and ensuring whistleblower protections. |
| Reportable Conduct | Includes, but is not limited to: <ul style="list-style-type: none"> • Fraud, corruption, or theft • Misuse of organisational resources or funds • Unethical or illegal behaviour • Bullying, harassment, or discrimination • Breaches of confidentiality or privacy laws • Breaches of the Aged Care Act, Support at Home requirements, or conditions of registration as an Aged Care provider • Serious neglect, abuse or harm (actual or risk of) to clients • Systemic or repeated failures in care quality or governance • Breaches of professional standards, codes of conduct or serious misconduct • Reprisals or threats of reprisal against someone who has raised concerns • Any conduct that poses a risk to the health, safety, or wellbeing of clients, employees, or the community • Any attempt to conceal such conduct |
| Whistleblower Disclosure | A report will be treated as a Whistleblower Disclosure if: <ul style="list-style-type: none"> • You are an Eligible Person • The report is determined as Reportable Conduct; and • The report was made to an Eligible Recipient |

Scope

This Policy applies to Eligible Persons and Eligible Recipients.

This Policy does not interfere with your rights under applicable Australian law and does not prevent you from exercising those rights.

Policy

How to report a concern

Individuals should report suspected wrongdoing to an Eligible Recipient. Reports may be made orally or in writing.

Disclosures may be based on reasonable suspicion. For disclosures relating to Aged Care, a disclosure may also be a complaint or feedback.

Protections for Whistleblowers

CatholicCare is committed to protecting whistleblowers from:

- Detriment, victimisation, harassment, or discrimination, dismissal or demotion
- Administrative, civil or criminal liability for making the disclosure
- Any form of retaliation as a result of making a report in good faith.

Disclosures can be made anonymously. Whistleblowers are entitled to confidentiality under the *Corporations Act 2001 (Cth)* and the *Aged Care Act 2024 (Cth)* (as applicable). CatholicCare will take all reasonable steps to protect the identity of the whistleblower (if known) and ensure information related to the disclosure is handled securely and in line with privacy legislation.

Information will only be shared where:

- Required or permitted by law;
- With the consent of the whistleblower; or
- Necessary to investigate the matter.

Handling and Investigating Reports

Whistleblower disclosures will be managed in accordance with the Whistleblower Reporting Misconduct Procedure. Disclosures will be acknowledged (where contactable). Reports will be assessed and investigated in a fair, timely and confidential manner. Any officer or employee of CatholicCare who is mentioned in the disclosure or to whom the disclosure relates will be treated fairly in accordance with principles of procedural fairness and natural justice.

Where disclosures are made to STOPline they will be triaged and escalated to the Disclosure Coordinator.

Investigations may be conducted internally or referred to an external investigator depending on the nature of the disclosure.

Where the whistleblower is known, the outcome of the investigation will be shared. The details that can be shared will be subject to privacy considerations of those against whom the report has been made. Action will be taken based on findings, that may include corrective or disciplinary action where required. Outcomes will be monitored to prevent systemic recurrence.

Where appropriate, findings will be reported to the CEO and Board (or a subcommittee, such as Audit & Risk Committee).

Support for Whistleblowers

Whistleblowers will have access to support services, including Employee Assistance Program (EAP) counselling.

70.12 / 1: WHISTLEBLOWER POLICY

Approved by: The CatholicCare Sydney Board

Implementation date: Dec 2025

Page 3 of 5

Approval date: Dec 2025

Review date: Dec 2027

*This quality management document will be considered uncontrolled once printed.
Always refer to Central for the latest approved version.*

CatholicCare
SYDNEY

Either CatholicCare (via the Disclosure Coordinator) or STOPline, as appropriate, will ensure that the Whistleblower is kept updated during the investigation and informed of the outcomes, subject to privacy considerations for the person against whom the report is made.

In the case of a disclosure that qualifies for protection under the *Aged Care Act 2024* (Cth), if a whistleblower is concerned that there has been a contravention of the confidentiality protections of the Act, the whistleblower may:

- Report the concern to the Disclosure Coordinator, or
- Report the concern to any Eligible Recipient.

Reports of such concerns will also be protected in accordance with this Policy.

Communication and Training

This Policy will be communicated to all employees and volunteers through induction training. It will be available on CatholicCare intranet, and the whistleblower disclosure pathway will also be made available via the external website. It will also be communicated to individuals to whom the CatholicCare delivers funded aged care services and supporters of those individuals upon request.

Grievances not covered by this Policy

Disclosures that are not assessed as Reportable Conduct do not qualify for protection under this Policy. For clarity, in most circumstances, disclosures relating to personal, work-related grievances will not qualify for protection under this Policy.

Employees can raise personal work-related grievances and other types of issues or concerns that are not covered by the policy through People & Culture and other designated channels in line with the Internal Grievance Procedure.

Employees are encouraged to seek legal advice about their rights and protections under employment or contract law, and to resolve their personal work-related grievance.

Impact Assessment

Moderate: This policy is to be reviewed in 2 years

Related Documents

Legislation/Regulations

- The Corporations Act 2001 (Cth)(the Act) as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2019 (Cth)
- The Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2019 (Cth).
- Corporations Act 2001 (Cth).
- ASIC Act 2001 (Cth).
- The Banking Act 1959 (Cth)
- Part 5 of Chapter 7 of *Aged Care Act 2024* (Cth)
- Sections 165-40 to 165-60 Aged Care Rules 2025

70.12 / 1: WHISTLEBLOWER POLICY

Approved by: The CatholicCare Sydney Board

Implementation date: Dec 2025

Page 4 of 5

Approval date: Dec 2025

Review date: Dec 2027

*This quality management document will be considered uncontrolled once printed.
Always refer to Central for the latest approved version.*

CatholicCare
SYDNEY

Related Documents

- Code of Ethics and Conduct
- Whistleblower Reporting Misconduct Procedure

Approval and Version History

| | |
|---------------------|---|
| Document Sponsor | : Executive Director - People & Culture |
| Approving Authority | : Board of Directors, CatholicCare Sydney |
| Approval date | : Dec 2025 |
| Implementation date | : Dec 2025 |
| Review period | : 2 years |
| Review date | : Dec 2027 |
| Supersedes | : 70.12 / 0 |

70.12 / 1: WHISTLEBLOWER POLICY

Approved by: The CatholicCare Sydney Board

Implementation date: Dec 2025

*This quality management document will be considered uncontrolled once printed.
Always refer to Central for the latest approved version.*

Page 5 of 5

Approval date: Dec 2025

Review date: Dec 2027

CatholicCare
SYDNEY