

# Whistleblower Protection Policy

Victorian Elderly Chinese Hostel (VECH)

## 1. Policy Overview

Item	Details
Policy Name	Whistleblower Protection Policy
Reference Number	P&P 2.11
Organisation	Victorian Elderly Chinese Hostel (VECH)
Applies To	Residents, families, representatives, staff, volunteers, contractors, students, suppliers
Approved By	Hostel Management
Review Cycle	Annual
Legislation & Standards	Aged Care Act 2024, Aged Care Rules 2025, SIRS, Strengthened Aged Care Quality Standards (Standards 1–7)

## 2. Purpose and Objectives

Purpose	Objectives
To promote a culture of openness, integrity and accountability, and to ensure people feel safe to speak up about serious concerns.	<ul style="list-style-type: none"> <li>• Provide safe and confidential reporting pathways</li> <li>• Protect individuals from retaliation or disadvantages</li> <li>• Ensure concerns are assessed, investigated and addressed appropriately</li> <li>• Meet legal, regulatory and governance obligations</li> <li>• Use information to improve systems and resident safety</li> </ul>

## 3. Definitions

Term	Definition
Whistleblower	A person who reports suspected wrongdoing or misconduct in good faith.
Disclosure	Information provided by a whistleblower about actual or suspected wrongdoing.
Qualifying Disclosure	A disclosure made where there are reasonable grounds to suspect a breach of the Aged Care Act, Rules, or Quality Standards.
Protected Disclosure	A qualifying disclosure that attracts legal protections such as confidentiality and protection from detriment.
Wrongdoing / Misconduct	Includes abuse, neglect, exploitation, unsafe care, breaches of law or standards, fraud, corruption, theft, serious bullying, harassment, or conduct posing risk to safety or wellbeing.
Detriment	Any disadvantage or harm, including retaliation, harassment, demotion, loss of shifts, threats, or unfair treatment as a result of making a disclosure.

<b>Eligible Recipient</b>	A person or body authorised to receive whistleblower disclosures, including VECH management, the Board Chair, or relevant external authorities.
<b>SIRS</b>	The Serious Incident Response Scheme, a mandatory reporting framework for serious incidents in aged care.

#### 4. Who Can Make a Disclosure

<b>Eligible Persons</b>
<ul style="list-style-type: none"> <li>• Current and former employees</li> <li>• Volunteers</li> <li>• Contractors and suppliers</li> <li>• Students and trainees</li> <li>• Residents (care recipients)</li> <li>• Family members or representatives</li> <li>• Any other eligible person under the Aged Care Act 2024</li> </ul>

#### 5. What Can Be Reported (Qualifying Disclosures)

Category	Examples
<b>Care and Safety</b>	Abuse, neglect, exploitation, unsafe care, poor infection control, medication errors
<b>Legal and Compliance</b>	Breaches of the Aged Care Act, Rules, Quality Standards or SIRS obligations
<b>Governance and Ethics</b>	Conflicts of interest, unethical decision-making, concealment of serious incidents
<b>Financial Misconduct</b>	Fraud, corruption, theft, misuse of organisational funds
<b>Workplace Misconduct</b>	Serious bullying, harassment, discrimination or coercion
<b>Other Serious Risks</b>	Any conduct that threatens resident safety, staff wellbeing or organisational integrity

#### 6. Matters Not Covered (Unless Serious or Systemic)

Not Normally Covered	Examples
<b>Personal work-related grievances</b>	Rostering, workload, performance management, promotion or pay decisions
<b>General complaints</b>	Routine care or service feedback
<b>Routine incidents</b>	Errors or near misses managed through incident management or SIRS
<b>Resolved matters</b>	Issues already investigated and closed with no ongoing risk
<b>Malicious reports</b>	Knowingly false or vexatious allegations

#### 7. Reporting Channels

Nothing in this summary or the underlying policy prevents or discourages a person from making a disclosure directly to an external authority at any time.

Reporting Option	Details
Internal Reporting	<ul style="list-style-type: none"> <li>• General Manager</li> <li>• Clinical Manager</li> <li>• Board Chair (especially for senior leadership or governance concerns)</li> </ul>
External Reporting	<ul style="list-style-type: none"> <li>• Aged Care Quality and Safety Commission</li> <li>• Police (criminal matters)</li> <li>• Department of Health, Disability and Ageing</li> <li>• ASIC / ACNC</li> <li>• WorkSafe Victoria</li> </ul>
Anonymous Reporting	<ul style="list-style-type: none"> <li>• Anonymous disclosures are accepted and assessed</li> </ul>

## 8. Information to Include in a Disclosure (If Available)

Recommended Information
Description of the concern or alleged misconduct
When and where the issue occurred
Names or positions of people involved (if known)
Whether the issue is ongoing or recurring
Any supporting evidence (documents, emails, photographs)
Whether the matter has been reported previously

## 9. Whistleblower Procedure – Response and Investigation

Step	Description
1. Receipt of Disclosure	Disclosure received verbally, in writing or anonymously
2. Immediate Safety Check	Any risk of resident harm assessed immediately, including SIRS obligations
3. Acknowledgement	Identifiable whistleblowers acknowledged within 2 business days
4. Triage	Matter assessed based on seriousness, risk and urgency
5. Investigation	Conducted by an impartial and appropriately qualified person, with external investigator engaged where required.
6. Findings	Assessment of evidence and determination of outcomes
7. Actions	Corrective actions, disciplinary action, system or policy review
8. Reporting	Mandatory reporting to regulators where required

<b>9. Governance Oversight</b>	Serious matters reported to the Board
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## 10. Protection for Whistleblowers

Protected From
<ul style="list-style-type: none"> <li>• Retaliation or victimization</li> <li>• Bullying, harassment or intimidation</li> <li>• Demotion or unfair changes to duties</li> <li>• Loss of shifts or professional opportunities</li> <li>• Threats, coercion or unfair disciplinary action</li> </ul>

## 11. Confidentiality and Legal Protection

Protection Type	Explanation
Confidentiality	Identity protected and shared only on a need-to-know basis, unless legally required
Anonymity	Anonymous reporting permitted
Legal Protection	Protection from civil, criminal and administrative liability for making a disclosure
Limits	Protections do not extend to misconduct by the whistleblower

## 12. Support Available

Support Options
<ul style="list-style-type: none"> <li>• Employee Assistance Program (EAP)</li> <li>• Cultural and language support</li> <li>• Advocacy or independent support person</li> <li>• External regulators or advisory services</li> </ul>

## 13. Governance, Record Keeping and Continuous Improvement

Area	Approach
Record Keeping	Secure and confidential storage of disclosures and outcomes
Governance Oversight	Board review of serious disclosures, trends and risks
Continuous Improvement	Systemic issues incorporated into the Continuous Improvement Plan

**\*Note:** This document is a summary only and should be read in conjunction with P&P 2.11 Whistleblower Protection Policy.