Whistleblowers Policy

POLICY STATEMENT

PRONIA encourages and facilitates the reporting of suspected wrongdoing. We are committed to providing safe and accessible reporting options, managing disclosures confidentially and fairly, protecting whistleblowers from detrimental conduct, and taking appropriate action where wrongdoing is identified.

1. Purpose

This Policy establishes PRONIA's commitment and governance framework for:

- encouraging the reporting of suspected illegal, inappropriate or unethical conduct;
- ensuring disclosures are received and managed appropriately;
- protecting eligible whistleblowers and others involved in the process;
- ensuring allegations are assessed and, where appropriate, investigated fairly and independently; and
- supporting compliance with applicable whistleblower, aged care, corporate, privacy and workplace obligations.

Operational requirements are set out in the **Whistleblower Reporting and Investigation Procedure**.

2. Scope

This Policy applies across all PRONIA operations and services.

It applies to PRONIA Board members, employees, volunteers, contractors, associated providers, consultants, agency workers and other persons covered by applicable whistleblower legislation. Reporting pathways are also available to clients, participants, families, carers, supporters, advocates and other people wishing to raise concerns about PRONIA.

For PRONIA's aged care services, the whistleblower protections in the *Aged Care Act 2024* apply where the statutory requirements are met. A person may make a qualifying disclosure where they have reasonable grounds to suspect that PRONIA, a responsible person or an aged care worker has contravened aged care law.

For other PRONIA operations, eligibility and protection will be determined under applicable legislation, including the *Corporations Act 2001* and the *Taxation Administration Act 1953*, where relevant.

3. Overview

PRONIA supports simple, safe and accessible reporting of suspected wrongdoing. People who raise genuine concerns should be able to do so safely, securely and with confidence that their disclosure will be handled appropriately, their confidentiality will be protected, and they will not be subjected to retaliation or other detrimental conduct.

To provide an additional reporting option, PRONIA has appointed Integrity Line as an independent third-party channel for receiving whistleblower disclosures on PRONIA's behalf.

The service enables reports to be made by telephone or online, including anonymously, and provides them to PRONIA's authorised Designated Officers for assessment and action under this Policy.

The Client Fact Sheet provides a shorter, client-facing explanation of these arrangements. This Policy provides the corresponding organisational governance and management framework.

4. Guiding Principles

PRONIA will:

- promote a culture in which people feel safe and supported to speak up;
- provide internal and independent third-party reporting options;
- accept anonymous disclosures;
- treat disclosures seriously, sensitively, confidentially and without bias;
- protect whistleblowers from retaliation, victimisation and other detrimental conduct;
- ensure disclosures are assessed and managed by appropriately authorised people;
- manage actual, potential and perceived conflicts of interest;
- apply procedural fairness to people affected by allegations;
- act promptly and proportionately, having regard to the nature, seriousness and complexity of the matter;
- meet any mandatory incident, regulatory or law-enforcement reporting obligations; and
- use disclosure information to strengthen governance, risk management, service quality and organisational culture.

5. Reportable Conduct

A person may make a disclosure where they have reasonable grounds to suspect illegal, inappropriate, unethical or other reportable conduct. The person does not need to prove the concern before reporting it.

Reportable conduct may include:

- physical, psychological, financial or other abuse, neglect or exploitation of a client or participant;
- inappropriate receipt of gifts, money or other benefits from a client or participant;
- fraud, theft, bribery, corruption, money laundering, misappropriation or other financial irregularity;
- serious or systemic misconduct, governance failure or deliberate concealment of wrongdoing;
- failure to comply with legal, regulatory or aged care requirements;
- conduct creating a serious risk to client safety, quality of care, workplace health and safety, privacy or organisational integrity; or
- actual or threatened detrimental conduct because a person has made, intends to make, or is believed to have made a disclosure.

General service complaints and routine workplace grievances will ordinarily be managed through PRONIA's complaints, grievance or other relevant processes. A complaint, grievance or incident may also qualify as a whistleblower disclosure. Where it does, PRONIA will preserve all applicable whistleblower protections while managing the underlying issue through the appropriate process.

6. Reporting Options

PRONIA provides several reporting pathways. A disclosure may be made:

- directly to an appropriate PRONIA recipient;
- through **Integrity Line**, an independent whistleblower reporting service operated by Worklogic on PRONIA's behalf; or
- to an eligible external recipient where permitted by law.

A person may report verbally or in writing and may remain anonymous.

The available recipients, reporting channels, anonymity options and escalation arrangements are detailed in the **Whistleblower Reporting and Investigation Procedure**.

A person is not required to report internally before making an external disclosure where the law permits direct external reporting.

7. Confidentiality and Protection

PRONIA will protect the identity of a whistleblower and information likely to identify them to the fullest extent required by law. Identifying information will only be disclosed with consent or where authorised or required by law.

PRONIA will not tolerate retaliation, victimisation, discrimination, intimidation, adverse treatment or other detrimental conduct because a person has made, intends to make, or is believed to have made a protected disclosure.

Appropriate protective and support measures will be considered having regard to the circumstances and risks of each matter.

A whistleblower does not lose protection merely because a disclosure is not substantiated or is ultimately found to be incorrect, provided the applicable requirements for protection are met. Deliberately false or malicious reporting may be addressed separately, without limiting any statutory protection that otherwise applies.

8. Fair and Independent Management

Disclosures will be assessed and managed by appropriately authorised people who are impartial and free from actual or perceived conflicts of interest.

Where appropriate, PRONIA may appoint an external adviser or investigator. The use of Integrity Line to receive a disclosure does not automatically appoint Worklogic to advise on or investigate the matter. Any additional engagement will be considered and authorised separately.

People who are the subject of allegations will be treated fairly and respectfully, informed of relevant allegations at the appropriate stage, and given a reasonable opportunity to respond before an adverse finding is made.

9. Governance and Responsibilities

9.1 Board

The Board:

- oversees the effectiveness of PRONIA's whistleblower framework;
- receives appropriate de-identified reporting on significant disclosures, trends and systemic risks;

9.1.1 Board Chair

The Board Chair:

- oversees matters involving the Chief Executive Officer, Board members or other matters requiring Board-level consideration; and
- nominates an appropriately independent Board-level Designated Officer for Integrity Line and Board escalation purposes.

9.2 Chief Executive Officer

The Chief Executive Officer is responsible for ensuring this Policy and the associated Procedure are effectively implemented by:

- ensuring appropriate reporting, assessment, protection, escalation and investigation arrangements are maintained;
- overseeing corrective and remedial action; and
- reporting significant matters, risks and outcomes to the Board as appropriate.

9.3 Executive Leadership Team

The Executive Leadership Team is responsible for:

- promoting a safe speak-up culture;
- supporting implementation within their areas of responsibility;
- ensuring concerns are promptly escalated and handled confidentially;
- supporting protective, interim and corrective action; and
- withdrawing from any matter in which they are involved or conflicted.

9.4 General Manager - People, Culture & Wellbeing

The General Manager - People, Culture & Wellbeing is responsible for:

- maintaining the whistleblower framework and providing advice on its application;
- supporting appropriate protection, escalation and investigation arrangements;
- maintaining secure and confidential organisational records;
- monitoring themes, trends and systemic issues;
- coordinating awareness, education and continuous improvement; and
- administering PRONIA's Integrity Line arrangements unless conflicted in a particular matter.

9.5 Managers, Supervisors and Workers

Managers and Supervisors must receive concerns respectfully, protect confidentiality, and promptly escalate matters that may constitute a whistleblower disclosure. They must not independently investigate a disclosure unless authorised.
All workers must cooperate with authorised processes, maintain confidentiality and refrain from retaliation, victimisation or other detrimental conduct.

9.6 Integrity Line Designated Officers are responsible for:

- receiving and securely acknowledging reports transmitted by Integrity Line;
- promptly assessing applicable protections, safety risks, conflicts of interest, escalation requirements and regulatory obligations;
- ensuring that a report is redirected to an alternative Designated Officers or the Board-level contact where a conflict exists;
- maintaining confidentiality and limiting access to people who require the information to perform an authorised role; and
- ensuring appropriate action, investigation, feedback and closure in accordance with this Policy.

10. Monitoring, Reporting and Training

PRONIA will monitor disclosures, response timeframes, outcomes, corrective actions and systemic risks.

The Board will receive appropriate de-identified reporting. Identifying information will be protected in accordance with law.

PRONIA will provide appropriate information and training about whistleblower rights, protections and reporting arrangements. Relevant information will also be made accessible to clients, participants, families, supporters and other stakeholders.

11. Related Documents

- Whistleblower Reporting and Investigation Procedure
- Whistleblowers Policy - Client Fact Sheet
- Integrity Line Reporting Information
- Aged Care Code of Conduct
- Complaints and Feedback Management Policy
- Respectful Workplace Behaviour Policy
- Conflict of Interest Policy
- Fraud Risk Management Policy
- Incident Management Policy
- Privacy Policy
- Risk Management Framework
- Employee Safety and Wellbeing Policy

12. Legislative and Regulatory Framework

- Aged Care Act 2024 (Cth) and applicable Aged Care Rules
- Aged Care Code of Conduct
- Strengthened Aged Care Quality Standards
- Corporations Act 2001 (Cth), including applicable whistleblower protections
- Taxation Administration Act 1953 (Cth), where applicable
- ASIC Regulatory Guide 270 - Whistleblower policies
- Privacy Act 1988 (Cth)
- Fair Work Act 2009 (Cth)
- applicable Victorian workplace health and safety, criminal and regulatory requirements

Where legislation provides greater rights or protections than this Policy, the legislation prevails.

13. Review and Document Control

This Policy will be reviewed every two years, or earlier following significant legislative or regulatory change, a significant whistleblower matter, identified improvement opportunities, or at the direction of the Chief Executive Officer or Board.

The associated Procedure and client-facing information will be reviewed at the same time to ensure alignment.

Owner	General Manager - People, Culture & Wellbeing
Approval Authority	Chief Executive Officer Endorsed September 2026 Board approved September 2026
Review Date	August 2026
Review Cycle	Two years or earlier as required
Applies To	All PRONIA operations; aged care-specific provisions apply where the Aged Care Act 2024 applies