

Target audience

This document is applicable to Alfred Health board members, employees, patients, volunteers, visitors and other members of the public who have experience with or are impacted by aged care services provided by Alfred Health.

Purpose

This document provides the process to report concerns, how they are investigated and the available escalation options under the *Aged Care Act 2024* (Cth) (**Act**).

This document is specific to aged care services provided by Alfred Health, a registered provider, and its associated providers. Aged care services governed by the Act are provided by the following Alfred Health teams: Commonwealth Home Support Program (CHSP) and Transition Care Program (TCP).

Summary

Whistleblowing is the reporting of misconduct, unethical behaviour, or illegal activities. This Guideline safeguards individuals who report allegations of misconduct or breaches for CHSP and TCP services and is designed to promote a culture of transparency, accountability, and safety.

Whistleblowing can be an effective way of uncovering fraud and other misconduct which may not be identified by internal or external controls within an organisation. Alfred Health is committed to the principles of transparency and accountability and views whistleblowing as an opportunity to reflect upon organisational procedures and promote an ethical culture.

Where an individual believes, on reasonable grounds, that another person or persons associated with the organisation has been involved in illegal, improper or unethical conduct, they are encouraged and supported to report the conduct without reprisal or consequence.

This guideline extends to allegations that are raised regarding Alfred's Associated Providers. Associated Providers are organisations that Alfred Health partners with to deliver care to our patients. If a concern is raised regarding an Associate Provider or their staff, this will be managed in the same manner as described in this Guideline.

Definitions

Aged Care Worker means a person who is engaged to provide funded aged care services. This can be as an employee, contractor or volunteer of the Registered Provider or Associated Provider.

Associated Provider refers to organisations that Alfred Health engages with to deliver care to our patients. For example, the aged care facilities where our Transition Care Program (**TCP**) brokers beds, or a company that provides respite for Carers through Carer Services.

Complaint is an expression of dissatisfaction with care or a service that is provided by our clinicians, an aged care worker, an Associated Provider or a Responsible Person.

Feedback is a broader term that includes any comments, suggestions, or observations about aged care services. Feedback can be positive as well as negative.

Patient is inclusive and used when referring to older persons, consumers, carers, clients, families and other support people.

Responsible Person is a person who is in charge of, or has a significant influence, over the operations of Alfred Health's aged care services. It is also any person who has responsibility for overall management of the nursing services delivered in Alfred's aged care services.

Supporter is a person which an older person chooses to formally help them make and communicate their own decisions about their aged care, without making those decisions on their behalf

Options

You may wish to refer to Alfred Health's Public Interest Disclosures Policy for other processes to raise concerns and provide information.

If you have information that you wish to disclose, please be aware that disclosure can take place under this Guideline or the Aged Care Services Complaints and Feedback Guideline. It is the person disclosing information who decides how Alfred Health interacts with them, including which policy/guideline any information is handled under.

GUIDELINE

1. Aims

This document aims to:

- encourage the disclosure of wrongdoing;
- deter wrongdoing,
- ensure individuals who disclose wrongdoing can do so safely, confidentially and with confidence that they will be protected and supported;
- ensure that disclosures are dealt with appropriately and in a timely way;
- provide transparency around Alfred Health's framework for receiving, handling and investigating disclosures; and
- meet Alfred Health's legal and regulatory obligations.

2. How can an issue be raised?

Any individual who wishes to raise a matter that they believe may have breached a requirement of the Act, can do so:

- a) in writing; and/or
- b) verbally

in either an identifiable or anonymous way to any of the people outlined at 3.

3. Who can receive information?

An individual who discloses information will be known as a "discloser" (**Discloser**). A Discloser will qualify for protection under the Act if they disclose information to:

- a) an Appointed Commissioner or a member of the staff of the Aged Care Quality and Safety Commission (the details for contact to this body are located here: <https://www.agedcarequality.gov.au/contact-us>)
- b) the System Governor, or an official of the Department of Health, Disability and Ageing
- c) a registered provider (in this case, Alfred Health)
- d) a responsible person of Alfred Health
- e) an Alfred Health aged care worker
- f) a police officer, or
- g) an independent aged care advocate.

4. Eligibility for protection

A Discloser who qualifies for protection will not be subject to:

- a) any liability (civil, criminal, disciplinary or administrative);
- b) any contractual enforcement,

for making the disclosure. However, the Discloser is not immune from any penalty that may arise from their own conduct in the matter they disclosed.

5. How will a disclosure be handled

Alfred Health will treat all disclosures in a confidential manner.

As soon as practicable after a disclosure is made to an individual, the particulars of the concerns will be logged internally and made available to a limited, trained group of representatives for them to investigate.

Staff wishing to escalate disclosures or anyone wishing to make a disclosure in writing, please email: feedback@alfred.org.au.

Alfred Health has established Whispli, an anonymous and confidential channel for staff to safely raise workplace concerns and seek advice and support to resolve these concerns. These concerns may be as a person directly affected and/or as a person affected as a bystander/witness to events.

The Whispli case manager communicates with the staff member via a confidential messaging platform, providing support and coaching to guide the employee to address and resolve the issue of concern independently, or by using available systems within the organisation. Patterns of submissions and employee concerns are monitored and inform direct and indirect organisation interventions to enable positive culture. This may include providing feedback to the subject of a report if the employee does not feel able to do so themselves.

6. Process protection

If a person asks to remain anonymous in relation to a matter raised, Alfred Health will take steps to ensure that, to the extent possible, anonymity is maintained.

Please note, in circumstances where safety is an issue, it may not be possible to maintain complete anonymity. On such occasions, protective steps will be taken whilst ensuring that information divulged is limited as much as possible.

Alfred Health may be sanctioned for failing to take steps to preserve anonymity where it is requested or required.

Threats and/or retaliation in relation to a disclosure will not be tolerated and may be dealt with under Alfred Health disciplinary procedures.

7. Accessibility

Disclosers may require assistance with accessibility from Alfred Health. This may involve support with literacy, communication, navigating cultural and language differences, or addressing physical, mental, cognitive, and sensory needs. Alfred Health will provide support to ensure patients and their supporters are able to communicate their concerns and seek the appropriate response from Alfred Health.

8. Translating and interpreting

Where patients or their supporters do not speak English as a first language, professional translation services can be used to support the Whistleblower process (refer to Alfred Health's Patients Requiring Language Services Guideline).

9. Evaluation, training and reiteration

Alfred Health will:

- Update all its aged care workers, responsible persons and clients, on a monthly basis via email, welcoming disclosures under the Act and confirming the processes to escalate these matters;
- Provide training to all aged care workers on the reporting process; and
- Review this Guideline on an annual basis.

Key related documents

Key aligned policy

- Aged Care Service Provision Policy
- Aged Care Services Complaints and Feedback Management Guideline
- Patient Complaint Management Policy
- Patient Complaint Management Guideline
- Patient Feedback
- Anonymous Communications Platform – Whispli
- Patients Requiring Language Services Guideline

References

- Charter of Human Rights and Responsibilities Act 2006* (Vic)
- Aged Care Act 2024* (Cth)
- Aged Care Rules 2025* (Cth)

Keywords

Aged care, associated provider

Governance

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