

Lifetime Connect Limited

Whistleblower Policy

Policy Title	Whistleblower Policy	Policy Owner	General Manager
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Related Legislation	Aged Care Act 2024 (Cth); Aged Care Rules 2025 (Cth); Corporations Act 2001 (Cth); Public Interest Disclosure Act 2013 (Cth); Privacy Act 1988 (Cth); Fair Work Act 2009 (Cth)		
Related Documents	Code of Conduct; Complaints and Feedback Policy; Incident Management Policy; Open Disclosure Policy; Privacy and Confidentiality Policy; Fraud and Corruption Control Policy; Work Health and Safety Policy		

This Policy establishes Lifetime Connect Limited’s framework for speaking up about suspected wrongdoing, misconduct, improper conduct, unlawful behaviour, unsafe practices, and breaches of legal, regulatory, ethical, clinical, care, financial, governance or organisational requirements. It is designed to support a culture of integrity, transparency, accountability and safety, and to align with applicable whistleblower protections under Australian law, including aged care provider obligations.

1. Purpose

The purpose of this Policy is to ensure that eligible persons can raise concerns safely and, where available by law, receive appropriate protection from victimisation, reprisal, detriment or unfair treatment.

The Policy also sets out how Lifetime Connect Limited will receive, assess, manage, investigate and respond to disclosures in a timely, confidential, fair and trauma-informed manner.

Lifetime Connect Limited is a registered or funded aged care provider, this Policy also forms part of the organisation’s whistleblower system required under the Aged Care Act 2024 (Cth) and associated Rules and must be read consistently with those obligations.

- Encourage early reporting of concerns and suspected wrongdoing.
- Provide clear pathways for making disclosures, including anonymous disclosures where permitted.
- Protect whistleblowers and other affected persons from victimisation, threats, reprisals and other detriment.
- Support fair, objective and confidential assessment and investigation of disclosures.
- Promote compliance with Lifetime Connect Limited's legal, ethical, governance, safeguarding and quality obligations.
- Meet applicable obligations under the Corporations Act 2001 (Cth), aged care legislation and related regulatory requirements.

2. Scope

This Policy applies to Lifetime Connect Limited and, to the extent relevant, its directors, officers, responsible persons, employees, contractors, staff, volunteers and any other workers engaged by or on behalf of the organisation.

It also applies, where relevant to aged care services, to older people receiving services, former consumers, family members, carers, advocates, supporters and other persons who interact with Lifetime Connect Limited and wish to raise concerns about aged care-related conduct.

For aged care purposes, this Policy is intended to operate as part of a broader whistleblower system and applies to disclosures that may be made to the provider, a responsible person, or an aged care worker and external authorities as permitted by applicable aged care legislation.

3. Policy Statement

Lifetime Connect Limited is committed to fostering a culture in which people feel safe to speak up about concerns. We do not tolerate retaliation, victimisation, intimidation, harassment, discrimination or other detriment against a person because they have made, may make, or are believed to have made a disclosure, or because they have assisted with an assessment or investigation.

Concerns raised under this Policy will be treated seriously, respectfully and, wherever possible, confidentially.

4. Reportable Matters

A disclosure may relate to any reasonable suspicion of actual, suspected or potential wrongdoing, including but not limited to the following:

- fraud, theft, corruption, bribery, dishonesty or misuse of funds or assets;
- financial misconduct, accounting irregularities, falsification of records or misleading reporting;
- breaches of law, regulations, standards, funding conditions or regulatory requirements;
- serious misconduct, unethical conduct, abuse of authority or serious conflicts of interest;
- conduct that endangers health, safety, care quality or the wellbeing of consumers, workers or the public;
- clinical, service delivery, safeguarding or care concerns, including neglect, abuse, coercion or inappropriate practices;
- breaches of the rights, dignity, safety or privacy of consumers or clients;
- failure to comply with policies relating to quality, safeguarding, complaints, incident management, open disclosure, governance or risk;
- retaliation against a whistleblower or person supporting a disclosure;
- conduct that may cause significant reputational, legal, financial or operational harm to Lifetime Connect Limited; and
- in aged care, conduct reasonably suspected to involve a contravention of applicable aged care laws or obligations.

5. Matters Generally Not Covered as Whistleblower Disclosures

Personal work-related grievances that concern only the discloser's own employment and do not have broader misconduct implications may be more appropriately managed under other organisational processes, such as grievance, conduct, human resources or complaints procedures.

However, a matter may still be treated under this Policy where it also involves victimisation, systemic issues, unlawful conduct, serious misconduct, public safety, financial misconduct, or another protected matter under law.

6. Who Can Make a Disclosure

Disclosures may be made by current or former directors, officers, employees, contractors, suppliers, associates, volunteers and other workers of Lifetime Connect Limited, and, for aged care-related matters, by older people receiving services, former recipients of services, family members, carers, supporters, advocates and other persons who reasonably suspect wrongdoing in connection with Lifetime Connect Limited's aged care services or obligations.

7. How to Make a Disclosure

A disclosure may be made verbally or in writing. A person may identify themselves or remain anonymous, where permitted by law. Disclosures should be made to one of the following internal recipients:

- the General Manager;
- a member of the Executive Team authorised to receive disclosures;
- the Chair of the Board or a Board representative;
- for aged care matters, any aged care worker, responsible person or authorised representative of Lifetime Connect Limited, noting that aged care law may protect disclosures made to a broader range of recipients.

Where appropriate, a disclosure may also be made to an **external eligible recipient** or regulator, including a prescribed regulator or other body authorised by law.

For aged care matters, disclosures protected under applicable aged care law may be made to the provider, a responsible person of the provider, an aged care worker, **the Aged Care Quality and Safety Commission, the Complaints Commissioner, a police officer, or an independent aged care advocate**, subject to legislative requirements.

For corporate whistleblower matters, disclosures may in some circumstances be made to Australian Securities & Investments Commission (ASIC), Australian Health Practitioners Regulation Agency (APRA) , or another eligible external recipient under applicable law.

8. Information to Include in a Disclosure

Where possible, a disclosure should include sufficient information to enable assessment and response, such as what happened, when and where it happened, who was involved, whether there are witnesses or documents, whether there is immediate risk to any person, and whether the discloser seeks confidentiality or anonymity. A lack of complete information will not prevent a concern from being raised.

9. Confidentiality, Anonymity and Privacy

Lifetime Connect Limited will take reasonable steps to protect the identity of a discloser and any information likely to identify them, subject to legal requirements and the need to assess, investigate, respond to or report the matter. Information will only be shared on a strict need-to-know basis or where required or authorised by law.

Anonymous disclosures will be accepted to the extent practicable, although anonymity may limit the organisation's ability to seek further information, provide updates or fully investigate the matter. For aged care disclosures, particular care will be taken to preserve anonymity where requested and to restrict the use and disclosure of identifying information except as authorised by law, including where disclosure is reasonably necessary to investigate the matter, to obtain legal advice, to lessen or prevent a serious threat, or where the discloser consents.

All records and information arising from a disclosure must be stored securely and handled in accordance with privacy, confidentiality and recordkeeping obligations.

10. Protection from Detriment and Victimisation

No person may cause or threaten detriment to another person because they have made, may make, propose to make, or are suspected to have made a disclosure, or because they have assisted or intend to assist with an investigation.

Detriment may include dismissal, disciplinary action, demotion, discrimination, harassment, intimidation, bullying, psychological harm, reputational damage, disadvantage, injury or other unfavourable treatment.

Lifetime Connect Limited will assess reprisal risk, implement protective measures where needed, and respond promptly to any concern that a person is experiencing retaliation.

11. Assessment, Triage and Investigation

All disclosures received under this Policy will be assessed promptly to determine the nature of the concern, immediate risk issues, applicable legal framework, whether interim protective action is required, and the appropriate pathway for handling the matter.

Lifetime Connect Limited may investigate a disclosure internally or appoint an external investigator where independence, complexity or expertise requires it. Investigations will be conducted fairly, impartially and proportionately, with due regard to confidentiality, procedural fairness and the wellbeing of all affected persons.

Where a disclosure also raises mandatory notification, safeguarding, serious incident, regulatory reporting, complaints, feedback or open disclosure issues, those processes will be activated as required.

For aged care matters, the organisation will also consider whether the discloser wishes the issue to be managed as a protected disclosure, complaint or feedback matter where legislation permits that choice, while ensuring any available whistleblower protections are preserved.

12. Fair Treatment of Persons Mentioned in a Disclosure

Lifetime Connect Limited will take reasonable steps to ensure fair treatment of any person who is mentioned in a disclosure or to whom a disclosure relates. This includes objective assessment, protection of confidentiality, avoidance of prejudgment, and provision of procedural fairness consistent with the nature of the matter and legal obligations.

Support may also be offered to persons who are the subject of, or affected by, a disclosure.

13. Outcomes and Corrective Action

Where a disclosure is substantiated or otherwise indicates a need for action, Lifetime Connect Limited will take appropriate steps, which may include corrective action, disciplinary action, control improvements, training, service improvement, consumer protection measures, external reporting, referral to authorities, or other governance or risk treatment measures.

The organisation may provide feedback to the discloser where appropriate and lawful, but may be limited in the detail it can share due to privacy, confidentiality or legal constraints.

14. Additional Aged Care Provider Requirements

Where Lifetime Connect Limited is delivering funded aged care services or otherwise subject to aged care whistleblower obligations, it will implement and maintain an effective whistleblower system as required by the Aged Care Act 2024 (Cth) and associated Rules. That system will support disclosures by workers, older people,

families, carers, advocates and other eligible persons, including anonymous disclosures made orally or in writing to the provider, a responsible person or an aged care worker.

The organisation will take reasonable steps to protect confidentiality, preserve anonymity where requested, support the discloser and other persons at risk of detriment, and prevent victimisation, discrimination or other adverse treatment.

Lifetime Connect Limited will publish this Policy in an accessible form, provide it to aged care workers and responsible persons, provide it to individuals receiving funded aged care services, and provide it to supporters or other persons on request. The organisation will make translated, culturally appropriate or alternative accessible formats available where reasonably required.

Lifetime Connect Limited will provide training to all aged care workers and responsible persons on induction, at least annually, and when there is a material change to the whistleblower system or to a person's relevant role. The organisation will also communicate regularly, and at least monthly where required by the aged care framework, that protected disclosures are welcome, encouraged and supported.

The whistleblower system and this Policy will be reviewed at least annually, and sooner if required by legislative change, incident, audit finding, complaint trend, identified control weakness or other trigger for review.

15. Interaction with Complaints, Feedback and Incident Management

A matter raised under this Policy may also constitute a complaint, feedback item, reportable incident, safeguarding concern, conduct issue, employment matter or legal issue. Lifetime Connect Limited may manage the matter under one or more relevant frameworks, provided that any available whistleblower protections are preserved.

In aged care, a person may choose, where legislation allows, whether the issue is managed as a complaint, feedback matter or protected disclosure.

Where something has gone wrong with an older person's care or services, the organisation will also consider whether open disclosure obligations are triggered and ensure the matter is managed in a way that protects the individual's rights, safety, dignity and participation.

16. Public Interest Disclosure Guidance

The Public Interest Disclosure Act 2013 (Cth) primarily applies to wrongdoing in the Commonwealth public sector and protects disclosures made by current or former public officials in accordance with that legislation. Lifetime Connect Limited is not, by virtue of this Policy alone, representing that all disclosures made to it are public interest disclosures under that Act.

Where a person indicates that they are a current or former Commonwealth public official, or the concern relates to Commonwealth public sector wrongdoing or a Commonwealth contract context, the organisation will, where appropriate, provide information about the need to use the correct authorised channels under the Public Interest Disclosure framework.

17. Roles and Responsibilities

- **Board:** oversee organisational integrity, governance, risk and compliance relating to whistleblower arrangements, and receive appropriate reporting on significant matters, systemic issues and control improvements.
- **General Manager:** ensure implementation of this Policy, appropriate escalation, resourcing, protection measures, system oversight and organisational response.
- **Governance / Risk / Compliance lead:** support intake, triage, recordkeeping, monitoring, reporting, training, policy review and coordination of any required regulatory interface.
- **Managers and supervisors:** respond appropriately to concerns raised, escalate disclosures promptly, preserve confidentiality, support affected persons and avoid reprisals.
- **Aged care workers and responsible persons:** complete required training, understand how to recognise and receive a protected disclosure, escalate it appropriately, protect confidentiality and not engage in victimisation.
- **Workers generally:** comply with this Policy, cooperate with investigations where required, maintain confidentiality and support a speak-up culture.

18. Breach and Non-Compliance

Any breach of this Policy, including failure to maintain confidentiality, failure to escalate a disclosure appropriately, victimisation of a discloser or witness, interference with an investigation, knowingly false reporting, or other non-compliance, may result in disciplinary action, performance management, contract action, reporting to the Board, notification to regulators or referral to external authorities, depending on the seriousness

of the matter. Nothing in this Policy prevents Lifetime Connect Limited from taking action in relation to a person's own misconduct that is identified through a disclosure.

19. Training, Communication and Accessibility

Lifetime Connect Limited will provide education and awareness to relevant personnel on this Policy and associated reporting obligations. Where aged care obligations apply, training will be provided to all aged care workers and responsible persons on induction, at least annually, and when there is a material change to the whistleblower system or to the person's role and responsibilities.

Training will cover how to recognise and respond to protected disclosures, how to preserve confidentiality and anonymity, how to manage personal information, escalation pathways, respectful engagement with disclosers, and the consequences of breaching obligations. Regular communication will reinforce that protected disclosures are welcomed and supported and where required by the aged care framework this communication will occur at least monthly.

20. Recordkeeping and Reporting

Lifetime Connect Limited will maintain secure records of disclosures, risk assessments, actions taken, investigation outcomes, protective measures, training activity, communication activity and control improvements, subject to legal, confidentiality and privacy requirements.

De-identified trend reporting may be provided to the Executive and Board to support governance oversight, risk management and continuous improvement. Where aged care obligations apply, records will be sufficient to demonstrate operation of the whistleblower system and compliance with applicable legislative and regulatory requirements.

21. Legislative and Related Documents

- **Legislation and regulatory framework**
 - Aged Care Act 2024 (Cth)
 - Aged Care Rules 2025 (Cth)
 - Corporations Act 2001 (Cth), including Part 9.4AAA
 - Public Interest Disclosure Act 2013 (Cth)
 - Privacy Act 1988 (Cth)
 - Fair Work Act 2009 (Cth)

- Work Health and Safety Act 2011 (Cth) or applicable State or Territory work health and safety legislation
Criminal Code Act 1995 (Cth), where relevant
- **Aged care regulatory and governance documents**
Statement of Rights
Code of Conduct for Aged Care
Strengthened Aged Care Quality Standards
Serious Incident Response Scheme requirements, where applicable
Open Disclosure Framework, where applicable
Complaints and feedback requirements under applicable aged care legislation
- **Related external guidance**
Aged Care Quality and Safety Commission guidance on whistleblower protections, strengthened Quality Standards, complaints and feedback, and open disclosure
Department of Health, Disability and Ageing guidance and implementation resources relating to the Aged Care Act 2024 (Cth), Aged Care Rules 2025 (Cth), whistleblower protections and provider readiness
Relevant guidance issued by ASIC, APRA, the Office of the Australian Information Commissioner, and work health and safety regulators, where applicable
- **Related standards and principles**
Statement of Rights
Statement of Principles, where applicable
Code of Conduct for Aged Care
Strengthened Aged Care Quality Standards
Consumer dignity, choice, safety and participation principles reflected in applicable aged care legislation and guidance
- **Related organisational documents**
Code of Conduct
Complaints and Feedback Policy
Incident Management Policy
Open Disclosure Policy
Risk Management Framework and Policy
Fraud and Corruption Control Policy
Privacy and Confidentiality Policy
Work Health and Safety Policy
Records Management or Document Control Policy

22. Review

This Policy will be reviewed at least every two years, and earlier where there is a legislative change, regulatory update, organisational change, material incident, identified control weakness or other reason requiring review.

Where aged care provider obligations apply, the whistleblower system and this Policy will be reviewed at least annually, and sooner where required to support continued compliance, effectiveness and continuous improvement.

23. Definitions

Disclosure means a report of information by a person who reasonably suspects wrongdoing, misconduct, unlawful conduct or another reportable matter under this Policy or applicable law.

Whistleblower means a person who makes, attempts to make, or is believed to have made a disclosure that may qualify for protection under applicable law or this Policy.

Detriment includes dismissal, demotion, harassment, intimidation, discrimination, injury, reputational harm, damage to property, financial loss or any other disadvantage or unfavourable treatment.

Responsible person has the meaning given by applicable aged care legislation, where relevant.

Aged care worker has the meaning given by applicable aged care legislation, where relevant, and may include employees, contractors, volunteers and other engaged persons covered by that framework.

Whistleblower system means the organisational arrangements, processes, training, communications, supports and controls used to receive, protect, assess, manage and respond to qualifying disclosures under applicable law.

Public interest disclosure means a disclosure made under the Public Interest Disclosure Act 2013 (Cth) by an eligible public official through the proper channels established by that legislation.