

Whistleblower Policy

1. Purpose

CPL Group is committed to the highest standards of ethical conduct, integrity, transparency, and accountability. We encourage anyone connected with CPL Group to speak up about wrongdoing, misconduct, or unsafe practices, particularly where these may impact the rights, safety, or wellbeing of older people, NDIS participants, workers or the organisation.

This policy aims to:

- Encourage the reporting of wrongdoing without fear of reprisal
- Provide strong protections for whistleblowers
- Ensure disclosures are handled safely, confidentially and fairly
- Meet CPL Group's statutory obligations under:
 - Corporations Act,
 - Aged Care Act and associated Rules
 - NDIS Act

2. Scope

This policy applies to current and former:

- Clients including older people receiving services
- Employees (permanent, part-time, casual)
- Family members, carers and advocates
- Volunteers and students
- Contractors, consultants and labour-hire workers
- Board members and committee members
- Suppliers and associates

3. What Is a Whistleblowing Disclosure

A whistleblowing disclosure is information that a person reasonably believes indicates:

- Misconduct, or
- An improper state of affairs or circumstances, or
- A contravention of legislation, including the Aged Care Act, Corporations or the NDIS Act.

Disclosures may be made anonymously, orally or in writing.

4. Reportable Conduct

4.1. General Misconduct

Including but not limited to:

- Fraud, theft, corruption or financial mismanagement
- Breaches of legislation or regulatory obligations
- Serious breaches of CPL Group policies or Code of Conduct
- Misrepresentation to regulators or funders
- Failure to manage conflicts of interest

4.2. Aged Care-Specific Disclosures

Protected disclosures include information suggesting a contravention of the Aged Care Act, including:

- Abuse, neglect or mistreatment of older people
- Breaches of the Statement of Rights or Aged Care Code of Conduct
- Unsafe, poor-quality or non-person-centred care
- Systemic governance or clinical failures
- Failure to respond appropriately to complaints or reportable incidents

4.3. NDIS-Specific Disclosures

Including:

- Abuse, neglect, exploitation or violence against NDIS participants
- Breaches of the NDIS Code of Conduct
- Non-compliance with NDIS Practice Standards
- Improper or fraudulent NDIS claims

4.4. What Is Not Covered

This policy does not generally apply to personal work-related grievances (e.g. interpersonal conflict or performance issues), unless the matter:

- Involves victimisation for whistleblowing, or
- Has broader systemic, regulatory or legal implications.

5. Who Can Receive a Disclosure

5.1. Internal Recipients

A disclosure may be made to any of the following, including any aged care worker, as required under the Aged Care Act:

- Any CPL Group aged care worker
- Any responsible person
- Any General Manager
- Chief Executive Officer, Chief Financial Officer or the Chief Operating Officer
- Chair or any Director of the Board

Note: Under the Aged Care Act, a disclosure made to any aged care worker qualifies for whistleblower protection.

5.2. External Recipients

Disclosures may also be made to:

- Aged Care Quality and Safety Commission
- Department of Health, Disability and Ageing (System Governor)
- NDIS Quality and Safeguards Commission
- Australian Charities and Not-for-profit Commission (ACNC)
- ASIC (Corporations Act matters)
- Police
- Independent aged care advocates
- The Department of Social Security

6. Whistleblower Protections

6.1. Confidentiality

CPL Group will take all reasonable steps to protect the identity of a whistleblower.

- A whistleblower's identity must not be disclosed without consent
- Information likely to identify the whistleblower must not be disclosed
- Disclosure is permitted only where authorised by law

Breaches of confidentiality are treated as serious misconduct.

6.2. Protection From Detriment

CPL Group strictly prohibits victimisation, retaliation or adverse treatment, including:

- Dismissal, suspension or demotion

- Harassment, intimidation or bullying
- Discrimination or reputational harm

Any retaliation will be treated as serious misconduct and may result in disciplinary action.

6.3. Immunity

Consistent with the Aged Care Act and Corporations Act:

- Whistleblowers are protected from civil, criminal and administrative liability for making a protected disclosure
- Protections do not extend to the whistleblower's own misconduct

6.4. Support for Whistleblowers

CPL Group will provide appropriate support, which may include:

- Access to the Employee Assistance Program
- Adjustments to work arrangements
- Ongoing wellbeing monitoring

7. Investigation and Management of Disclosures

All disclosures will be:

- Assessed promptly
- Managed confidentially and independently
- Investigated in accordance with CPL Group's Whistleblower Procedure
- Escalated to regulators where required

Note: Under the Aged Care Act, whistleblowers may elect to have their disclosure managed through the complaint's pathway or the whistleblower pathway, where applicable).

8. Training and Communication

(Aged Care Act requirement)

CPL Group will:

- Provide mandatory whistleblowing training to all aged care workers and responsible persons
- Ensure workers understand how to receive and escalate disclosures
- Communicate regularly that whistleblowing is encouraged and supported

9. Governance and Oversight

- The Board approves this policy
- The Group General Manager PLC acts as the CPL Group Whistleblower Protection Officer
- Reports on whistleblowing disclosures will be provided to the Board and/or the Finance & Risk Committee

10. False or Malicious Disclosures

Protections do not apply to disclosures made:

- Knowingly false, or
- With malicious intent.

Such conduct may result in disciplinary action.

11. Record-Keeping and Privacy

- Whistleblower records are stored securely
- Access is strictly limited
- Identities are recorded separately and protected