



Palm Lake Care Whistleblower Policy

1. Purpose

Palm Lake Care is committed to providing quality aged care services and fostering a culture of honesty, transparency, and accountability in its business. We value the courage it takes to speak up about concerns and are dedicated to ensuring that anyone who raises a genuine issue can do so safely and without fear of reprisal. This policy explains how to report serious wrongdoing, who to contact, and the protections that may be available for certain kinds of disclosures in accordance with the Aged Care Act 2024 (Cth) and the Corporations Act 2001 (Cth).

The policy aims to:

- Encourage a culture where Aged Care Workers, Responsible Persons, Individuals receiving funded aged care services in a Palm Lake Care home, their families and supporters and other stakeholders feel safe to raise concerns without fear of reprisal.
- Provide clear protections to whistleblowers in accordance with the whistleblower provisions of the Aged Care Act 2024, the Corporations Act 2001 and other relevant laws.
- Ensure that all disclosures qualifying for protection are managed in accordance with the law and in a fair, transparent (as far as is possible consistent with confidentiality obligations), confidential, transparent, safe, culturally safe and timely manner.
- Safeguard the wellbeing, rights and dignity of whistleblowers and all individuals involved and protect their anonymity in accordance with the applicable laws.
- Promote continuous improvement in governance, risk management, and service delivery by using disclosures to identify and address any systemic issues.

2. Who the policy applies to

This policy applies to individuals receiving funded aged care services in any Palm Lake Care home and their families, employees, contractors, volunteers, suppliers or anyone else with a direct connection to our organisation. Further details as they apply under the relevant laws are set out below.

3. Matters the policy applies to

This policy applies to disclosures about actual or suspected corporate misconduct, and to breaches of the Aged Care Act 2024.

Part 1 of this Policy sets out the policy of Palm Lake Care regarding disclosures made under the Whistleblower provisions in Chapter 7 of Part 5 of the *Aged Care Act 2024 (Cth)* (**Aged Care Act**)

Part 2 of this Policy sets out the policy of Palm Lake Care regarding disclosures under the whistleblower provisions of Part 9.4AAA of the Corporations Act 2001 (Cth) (**Corporations Act**).



PART 1: PROTECTED DISCLOSURES UNDER THE AGED CARE ACT

1. What matters are protected disclosures under the Aged Care Act?

A disclosure qualifies for whistleblower protections under the Aged Care Act when it is:

- made to an 'eligible recipient'. (Listed in **Section 3** of **Part 1** of this policy);
- provided verbally or in writing (whether anonymous or not); and
- the person providing the information has reasonable grounds to suspect that the information to be disclosed shows a failure to comply with the provision of the Aged Care Act.

This includes issues that affect the quality, safety or care of residents.

Examples of issues qualifying for whistleblower protections include:

- Neglect, abuse or unsafe care provided to individuals residing in a Palm Lake Care home.
- Misuse of aged care subsidies or funds, or refundable accommodation deposits.
- Non-compliance with conditions of funding or reporting obligations.
- Obstruction or falsification of records.
- Retaliation or victimization of a whistleblower.

Where a disclosure is about corporate or financial misconduct, the whistleblower protections under the Corporations Act may apply in addition to, or instead of, the Aged Care Act provisions. In that case, you should ensure that your notification meets the requirements of both laws in order to ensure the protections are available. You may wish to obtain independent legal advice about these circumstances.

2. What matters are not protected disclosures under the Aged Care Act?

Some matters are not eligible for protection or could be resolved through alternative pathways.

Personal work-related grievances

Personal work-related grievances are generally not eligible for protection. Such matters should be raised with your manager or through the Human Resources grievance process. Some examples of personal work-related grievances are interpersonal conflicts between staff members, performance feedback, promotion decisions or employment conditions. See **Part 2** for further information.

Complaints and feedback

You can choose to have your concern managed as a complaint, either to the aged care regulator, the Aged Care Quality and Safety Commission, or as a complaint or feedback to Palm Lake Care, instead of as a disclosure through the whistleblower



process. You can use the following channels to make a complaint or provide feedback on Palm Lake Care:

Email: feedback@palllake.com.au

Web: <https://palllakecare.com.au/feedback>

You can also make a complaint to the Aged Care Quality and Safety Commission through one of the following options:

- **phone:** 1800 951 822 (free call)
- **email:** info@agedcarequality.gov.au
- **online complaint form**
- **letter:** to Aged Care Quality and Safety Commission, GPO Box 9819, in your capital city.

The complaints process focuses on open communication and collaborative resolution of concerns, whereas the whistleblower process focuses on protecting confidentiality and provides additional legal safeguards for individuals who may fear reprisal for reporting serious wrongdoing.

For example, an employee who reports suspected financial fraud at Palm Lake Care may wish to remain anonymous and seek whistleblower protection, while a family member raising concerns about care quality provided to a loved one may prefer the complaints process allowing their family and staff to communicate openly and address the issue promptly.

If you elect to opt out of the whistleblower program (or your disclosure does not qualify as a protected disclosure under the Aged Care Act), this means that you will not be afforded all of the legal protections set out in this policy. However, you will be protected from any victimisation or discrimination as a result of raising your concern, in accordance with the applicable provisions of the Aged Care Act. Further information is available in our Complaints and Feedback Policy [which is available on our website at www.palllakecare.com.au]

3. Making a protected disclosure

Any person with information and reasonable grounds to suspect that the information shows a failure of Palm Lake Care or any of its Aged Care Workers or Responsible Persons to comply with a provision of the Aged Care Act, can make a disclosure of that information which may qualify for whistleblower protections under the Aged Care Act. This includes individuals receiving funded aged care services in any Palm Lake Care home and their families.

Under the Aged Care Act, you can make a whistleblower disclosure to any of the following individuals (each an 'Eligible Recipient'):

- An appointed Commissioner or a member of the staff of the Aged Care Quality and Safety Commission;
- The Secretary of the Department of Health, Disability and Ageing or an official of the Department;
- A police officer;



- Palm Lake Care in its capacity as a registered provider under the Aged Care Act;
- Directors, executives, service managers and other Responsible Persons of Palm Lake Care;
- An Aged Care Worker of Palm Lake Care Group; or
- An independent aged care advocate.

When you make your disclosure, you should let the Eligible Recipient know that you wish to make a whistleblower disclosure and whether or not you are making the disclosure on an anonymous basis (see section 4 below).

If you wish to make your disclosure to Palm Lake Care, as the registered provider of aged care services, it has a confidential whistleblower program that allows you to report concerns securely.

PLC is committed to ensuring that individuals can access this policy and raise a disclosure through a channel that is appropriate to their needs. This includes interpreter services for those who prefer to raise a concern in a language other than English or require translated materials, and reasonable adjustments for individuals with a disability.

You can if you choose, make a whistleblower disclosure to our Whistleblower Protection Officer, whose details are below:

Whistleblower Protection Officer Ben Winduss
(WPO) PLC Executive Manager People and Culture
0491 909 229 WPO@Palmlake.com.au

You can also notify any of the following individuals:

- the Palm Lake Care Chief Executive Officer;
- the Palm Lake Care Operations Manager;
- the Palm Lake Care Executive Manager, Clinical Governance

Whistleblower hotline

Palm Lake Care also has a confidential whistleblower hotline service, operated by an external provider, *Your Call*

- Telephone: 1300 790 228 (7am - midnight AEST business days)
- Online at www.yourcall.com.au/palmlake

Your disclosure should describe the grounds for the report and provide as much detail as possible of all relevant facts. You can remain anonymous if you wish. The external provider (Your Call Disclosure Officer) will prepare a report which details the



wrongdoing reported. All reports are forwarded to the Palm Lake Group Whistleblower Protection Officer for action.

4. Anonymity and confidentiality

When making a disclosure, you can do so anonymously and choose never to share your identity. If you want to remain anonymous you may choose to adopt a pseudonym by which you can be identified or use an email address that does not identify you. You can share your identity with us when making a disclosure, but we must take reasonable steps to keep your identity and the identity of any person you name confidential when dealing with the disclosure. We do not need to maintain that confidentiality if you consent to us by disclosing your identity (or the identity of other individuals named in your disclosure), or if the disclosure is necessary to lessen or prevent a serious threat to the safety, health or wellbeing of any individual.

Preserving anonymity may limit our ability to properly investigate your concerns and protect and support you and/or other individuals involved in the matter disclosed.

It may be necessary to disclose some information for the purpose of investigating the concerns raised, however all reasonable steps will be taken to reduce the risk of you being identified (unless you have provided consent to the disclosure of your identity).

We have measures in place for maintaining confidentiality, such as:

- Secure storage for documentation
- Restrictions on the number of people who are involved in investigating a disclosure
- Password-protected files and secure electronic communication channels for managing disclosures.

A discloser can lodge a complaint with Palm Lake Care's Whistleblower Protection Officer if they have concerns about an alleged breach of confidentiality of their identity or the identity of any other person named in the disclosure. The discloser also has the option of lodging a complaint with a regulator such as the Aged Care Quality and Safety Commission for a disclosure under the Aged Care Act, and for disclosures under the Corporations Act (see Part 2) to ASIC, APRA or the ATO for investigation.

5. Protections and support for disclosers

A discloser who makes a disclosure in accordance with this policy, and has reasonable grounds for doing so, will have the following legal protections under both the Aged Care Act (for disclosures relating to breaches of that Act) and under the Corporations Act (for disclosures made under the whistleblower provisions of that Act):

- Identity protection (see section 4 above);
- Protection from victimization, detrimental acts or omissions;
- Compensation and other remedies for any losses arising from any breach of the protections under the legal regime;



- Protection from civil, criminal, and administrative liability

Palm Lake Care will not engage in, or tolerate, any form of victimisation or threat of victimisation against a person who has made, or is believed or suspected to have made, a disclosure.

All reasonable steps will be taken to support and protect a discloser from any form of victimization and detriment, including harassment, retaliation, or discrimination, because they have made or propose to make a disclosure. This includes:

- our Whistleblower Protection Officer assessing the welfare and protection needs of disclosers and anyone named in a disclosure and may implement strategies such as relocation, reassignment, or other adjustments where required.
- Our Aged Care Workers and Responsible Persons receive regular training to ensure they understand what constitutes detriment and their legal obligation not to engage in such conduct.
- independent counselling and wellbeing support services are available to assist disclosers.

If you believe you are being subjected to any detriment or threat of detriment as a result of a disclosure or intention to make a disclosure, you should report it immediately to the Whistleblower Protection Officer or to the Aged Care Quality and Safety Commission. Any employee of Palm Lake Care engaging in detrimental conduct may face disciplinary action, including termination of their employment, and may also be subject to civil or criminal penalties. These protections also extend to anyone conducting or participating in an investigation.

Legal compensation may be sought should a discloser suffer loss, damage or injury because of a disclosure; or in certain cases if there is a failure to take reasonable precautions and exercise due diligence to prevent detrimental conduct against a discloser.

You are protected from any of the following in relation to your disclosure under this policy:

- civil liability (for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (for example, attempted prosecution of you for unlawfully releasing information, or other use of your disclosure against you in a prosecution (other than for making a false disclosure)); and
- administrative liability (for example, disciplinary action for making the disclosure).

Individuals who are themselves involved in improper conduct or illegal activities that are the subject of disclosure are not protected under the



whistleblower laws.

Protections are also not available for disclosures where the person does not have reasonable grounds to believe that the wrongdoing has occurred, for example if they know the allegations are untrue, or do not have reasonable grounds but make the disclosure in bad faith or for malicious reasons.

You may also lose protection under this policy if you disclose information to someone not authorised to receive it.

Wellbeing support

If you are experiencing stress or distress after raising a concern, counselling support is available.

Palm Lake Group employees have access to the Employee Assistance Program (EAP), which offers free, confidential short-term counselling and wellbeing support delivered by qualified professionals. The service is available 24/7 through the secure Sonder mobile app, accessible to all staff.

Anyone can also seek support from independent services such as Lifeline (13 11 14) or Beyond Blue (1300 22 4636).

6. How we investigate disclosures

After receiving a report, the Whistleblower Protection Officer will:

- Assess the report;
- Consider any conflicts of interest before investigating; and
- Determine whether and how to investigate the matter

The Whistleblower Protection Officer has the discretion to determine that a report will not be dealt with under this policy if the report does not fall within the scope of applicable whistleblower laws. In that case, if you have identified yourself, we will let you know and will let you know alternative ways your concerns can be addressed.

Investigations will be conducted in a timely, fair, and impartial manner, with receipt of a disclosure acknowledged within 2 business days. All reasonable efforts will be made to preserve confidentiality of an investigation, as required by the relevant laws. Any individuals who have been accused of misconduct will be afforded procedural fairness and will have an opportunity to respond to allegations.

If the identity of the discloser is known to us, the discloser will be provided with updates and outcomes of the matter. However, updates may be subject to confidentiality and privacy requirements under privacy and other laws relating to confidentiality.



7. Responsibilities of Eligible Recipients who receive a protected disclosure

All Eligible Recipients who are Aged Care Workers or Responsible Persons of Palm Lake Care are required to manage disclosures in accordance with this policy.

If you are listed in **Section 5 of Part 1** this Policy or in **Section 5 of Part 2** as an Eligible Recipient, and receive a protected disclosure (or think you may have received a protected disclosure) you must treat the disclosure seriously and in confidence. There are penalties relating to disclosing the identity of the discloser, so care must be taken that in responding to the disclosure or reporting the disclosure internally, Aged Care Workers and Responsible Persons do not identify the discloser or provide information that could identify them. Our Whistleblower Protection Officer will be able to assist you with managing this process.

If you receive information that you think may be a protected disclosure, you should ask the discloser whether they are making a complaint or a whistleblower disclosure. If the latter, you should also ask if they consent to you, disclosing their name and the name of any other person (who is not an employee of Palm Lake Care) internally and who you might need to inform about the disclosure. If they do not consent, you should ask them how they wish the matter to be dealt with. For example, if the person does not consent to disclosing their name you might say to them, "I will only be able to tell the Whistleblower Protection Officer/Service Manager that I have received an allegation about an alleged assault of a resident by [employee name] on date. Without disclosing additional identifying information, we may not be able to undertake a complete inquiry.

If you are unsure, you should contact the Palm Lake Care Whistleblower Protection Officer for further advice and guidance.

8. Responsibilities of the Whistleblower Protection Officer regarding protected disclosures

Key responsibilities of the Whistleblower Protection Officer include to:

- Receive disclosures and determine if they fall within the scope of the Policy
- Determine whether and how a disclosure should be investigated
- Investigate disclosures in accordance with this policy, and draw objective conclusions based on evidence gathered during the investigation
- Maintain confidentiality of the identity of disclosers and where requested, of any other person named in the disclosure (other than staff of Palm Lake Care) and of the disclosures they are investigating
- Update disclosers on progress and outcomes (to the extent possible)
- Manage any reported concerns regarding detrimental conduct arising from a disclosure
- Determine appropriate courses of action to remedy the disclosure as required, and also consider prevention of future instances
- Report to the board of directors of Palm Lake Care as required, while maintaining confidentiality of disclosers (unless they have consented to being identified).



9. Support for Aged Care Workers or other individuals implicated in a disclosure

Any employee or contractor of Palm Lake Care who is implicated in a disclosure will be afforded fair treatment and an impartial investigation. They may be temporarily stood down whilst an investigation is conducted. Alternatively, they may be temporarily transferred to another workplace if it is deemed appropriate in the circumstances.

Within the constraints of confidentiality, an employee or contractor who is implicated in a disclosure has the right to be informed of the allegations against them and be given the opportunity to respond to those allegations. They can also provide additional information, if relevant, in the course of an investigation into those allegations.

In the case of an employee being investigated, the employee will be respondent to the Employee Grievance and Disciplinary policy and the accepted practice as per Fairwork guidelines in respect to procedural fairness. No formal actions or decisions affecting their ongoing employment will be made until the investigation is finalised however the employee may be stood down on full pay during the investigation to ensure the ongoing safety of residents and to allow the employee the opportunity to prepare a response to the investigation.

Persons implicated in a disclosure may also access independent counselling and wellbeing services as set out in **section 5**.



Part 2: PROTECTED DISCLOSURES UNDER THE CORPORATIONS ACT

The Corporations Act also provides a whistleblower regime for corporate wrongdoing. As a company, Palm Lake Care must also comply with the whistleblower provisions found in Part 9.4AAA of the Corporations Act. Whistleblower protections are also applicable for disclosures made under that Act instead of, or in addition to those available under the Aged Care Act 2024.

1. What types of matters are protected disclosures under the Corporations Act 2001?

A matter that a person has reasonable grounds to suspect concerns corporate misconduct or an improper state of affairs or circumstances, in relation to Palm Lake Care, our business or in relation to an officer or employee of Palm Lake Care (e.g. fraud, negligence, default, breach of trust, and breach of duty) is a protected disclosure under the Corporations Act:

It includes (but is not limited to) matters that:

(a) are an offence against, or a contravention of, a provision of any of the following:

- (i) the *Corporations Act 2001*;
- (ii) the *ASIC Act*;
- (iii) the *Banking Act 1959* ;
- (iv) the *Financial Sector (Collection of Data) Act 2001*;
- (v) the *Insurance Act 1973*;
- (vi) the *Life Insurance Act 1995*;
- (vii) the *National Consumer Credit Protection Act 2009*;
- (viii) the *Superannuation Industry (Supervision) Act 1993*;

(b) are an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or

(c) represent a significant danger to the public or to the stability of or confidence in the financial system.

Examples of conduct that may be reportable under the Corporations Act include serious environmental breaches, serious dishonesty or corrupt conduct; misuse of company funds, money laundering, misuse of business information, or other corporate offences. Disclosable matters under the Corporations Act do not necessarily impact the safety, quality or care of individuals receiving aged care services.



As long as the discloser had reasonable grounds to consider that misconduct of a relevant kind occurred, the discloser will still have whistleblower protections even if the concerns were not correct or cannot be substantiated.

2. What kinds of disclosures are not protected under the Corporations Act 2001?

Disclosures that relate solely to personal work-related grievances generally do not qualify for protection under this policy (although they may if they involve conduct of a kind referred to above).

Examples of personal work-related grievances may include:

- An interpersonal conflict between the discloser and another employee;
- A decision about the engagement, transfer or promotion of the discloser;
- A decision about the terms and conditions of engagement of an employee; or
- A decision to suspend or terminate the engagement of an employee, or otherwise to discipline the discloser where they are an employee.

A disclosure about a workplace grievance may still qualify for protection or a legal remedy if it includes information about misconduct, if it is outlined as a disclosable matter, or if the discloser is suffering from or is being threatened with detriment for making a disclosure.

3. Who can make a protected disclosure under the Corporations Act 2001?

Protected disclosures can be made by any individual who is a current or former:

- Employee or officer of Palm Lake Care;
- Supplier or associate of Palm Lake Care; or
- Relative or dependent of any individual referred to above.

4. Who can receive a protected disclosure under the Corporations Act 2001?

To ensure the protections of the Corporations Act apply to a disclosure, you should only make a disclosure to one of the following Eligible Recipients:

- the Palm Lake Care Whistleblower Protection Officer (see **sections 3 and 8 in Part 1** above).
- the Whistleblower hotline (see **Section 3 in Part 1** above);
- the Palm Lake Care Chief Executive Officer;
- the Palm Lake Care Operations Manager;
- the Palm Lake Care Executive Manager Clinical Governance;
- Any officer or senior manager of Palm Lake Care;
- A legal practitioner for the purpose of obtaining legal advice about your disclosure;
- ASIC, APRA, or an Australian Government authority otherwise prescribed to receive disclosures.



Refer to **Section 3 of Part 1** of this policy for contact details. You should note Eligible Recipients under the Corporations Act are in some cases different to the Eligible Recipients under the Aged Care Act. If you think your disclosure may qualify as a protected disclosure under both regimes, you should make your disclosure to one of the individuals named above (for example if your disclosure relates to financial misconduct involving refundable accommodation deposits).

You can make your disclosure anonymously.

You can also make a public **interest disclosure** under the Corporations Act to a journalist or parliamentarian where all the following conditions are met:

- Where more than 90 days have passed since your disclosure to ASIC, APRA or another Australian Government body prescribed by regulation, and you do not have reasonable grounds to believe that action is being taken and the discloser has, after 90 days, given the regulator who received the original disclosure a written notice, identifying the previous disclosure and stating that the discloser intends to make a public interest disclosure;
- the discloser has reasonable grounds to believe that making a further report to a journalist or member of parliament would be in the public interest; and
- the discloser **only** provides information to the extent necessary to inform the journalist or member of parliament of the disclosable matter.

An **emergency disclosure** can also be made to a journalist or member of parliament if all of the following conditions are met:

- more than 90 days have passed since the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation, and the discloser does not have reasonable grounds to believe that action is being taken and the discloser has, after 90 days, given the regulator who received the original disclosure a written notice, identifying the previous disclosure and stating that the discloser intends to make an emergency disclosure; and
- the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of one or more persons or to the natural environment;
- the discloser only provides information to the extent necessary to inform the journalist or member of parliament of the substantial and imminent danger.

A discloser should contact an independent legal advisor before making a public interest or emergency disclosure.

5. What protections will a whistleblower under the Corporations Act 2001 receive?

Palm Lake Care is committed to protecting and supporting whistleblowers by making a disclosure in accordance with this policy and the applicable law. If you make a disclosure covered by this policy, the following are in place to protect you:

- Identity protection (see **Section 4 of Part 1** above);



- Protection from detrimental acts or omissions (see **Section 5** of **Part 1** above);
- Compensation and other remedies (see **Section 5** of **Part 1** above);
- Civil, criminal, and administrative liability protection (see **Section 5** of **Part 1** above).

Those protections apply not only to disclosures to Palm Lake Care, but also to disclosures to lawyers (for the purposes of obtaining advice about a potential disclosure), regulatory and other external bodies, and public interest disclosures and emergency disclosures described in **Section 4** this **Part 2**.

You should seek independent legal advice on compensation or other remedies that may be available.

The above protections do not grant immunity for any misconduct you have engaged in that is revealed in your disclosure. For more information, you should seek independent legal advice before making your report.

6. How we investigate disclosures

For information about how we investigate protected disclosures, please see Section 6 in Part 1 of this Policy.

7. Responsibilities of Eligible Recipients

For information about the responsibilities of Eligible Recipients who receive protected disclosures, please see Section 7 in **Part 1** of this Policy.

8. Whistle Blower Protection Officers

For information about the roles of Palm Lake Care's Whistleblower Protection Officers, please see **Section 8** in **Part 1** of this Policy.

9. Support for affected employees

For information about processes and support for employees who are the subject of a protected disclosure, please see **Section 9** in **Part 1** of this Policy.

PART 3

1. Definitions used in this policy

- a) **Aged Care Worker** is defined in section 11(4) of the Aged Care Act and under this policy means:
- i. an individual employed or otherwise engaged (including as a volunteer) by Palm Lake Care to deliver funded aged care services to individuals residing in a Palm Lake Care home.
 - ii. an individual who:
 - A. is employed or otherwise engaged (including as a volunteer) by an associated provider (a sub-contractor) of Palm Lake Care; and



- B. is engaged in conduct under the associated provider's arrangement with Palm Lake Care relating to the delivery of aged care services to individuals residing in a Palm Lake Care home.
- b) **APRA** means the Australian Prudential Regulatory Authority.
- c) **ASIC** means the Australian Securities and Investments Commission.
- d) **Responsible Person** is defined in section 12 of the Aged Care Act and in this policy means each of the following individuals:
- any person responsible for the executive decisions of Palm Lake Care, including its directors;
 - any other person with authority or responsibility for (or significant influence over) planning, directing or controlling the activities of Palm Lake Care;
 - any person who has responsibility for overall management of the nursing services delivered at a Palm Lake Care home and who is a registered nurse;
 - any person who is responsible for the day-to-day operations of a palm Lake Care home (e.g. the services manager).

2. Governance

Governance and oversight of this policy is provided by the Palm Lake Care Board (**Board**).

Whistleblower Protection Officers will provide quarterly reports to the Board, and anonymity and confidentiality requirements will be observed during the reporting process.

Where a wrongdoing disclosure is assessed as having a high impact, it will be immediately escalated to the Chief Executive Officer.

Palm Lake Care reviews its whistleblower system annually, or more often if necessary.

3. Staff training and program awareness

This policy is made available on the Palm Lake Care intranet, and a summary is available on the internet.

Training on the whistleblower policy and procedures is provided to Board members, other Responsible Persons and all Palm Lake Care Aged Care Workers at least annually to assist in their understanding of their responsibilities and when:

- a person becomes an Aged Care Worker or Responsible Person of Palm Lake Care;
- when there is a change to Palm Lake Care's systems that affects the person's roles and responsibilities in the system; and
- when there is a change to the person's role that affects the person's roles and responsibilities at Palm Lake Care.

Aged Care Workers and Responsible Persons will be reminded at least monthly that disclosures that qualify for protection under the Aged Care Act are welcome.



4. Related policies

- Palm Lake Care Feedback and Complaints Management Policy
- Palm Lake Care Code of Conduct
- Palm Lake Group Information Privacy Policy
- Palm Lake Care Incident Management- Abuse Prevention & SIRS Policy
- Palm Lake Care Board Charter
- Palm Lake Care Grievance Management Policy

Document Control

Version	Prepared By	Effective Date	Amendments
2.0	Daniel Aitchison	6 March 2026	Revision to align with Aged Care Act 2024
3.0	Daniel Aitchison	22 July 2026	Whistleblower Protection Officer role reassigned to Executive Manager, People and Culture, with a dedicated mailbox established. Minor additions of accessibility and disclosure acknowledgement statements