



Reference No	POL-020	Whistleblower Policy
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Current version number	1			
Review frequency	Annually	☐	Every two years	☒
Approved by	Board	☒	CEO	☐
Date current version approved	22 September 2026			
Next review date	22 September 2028			
Applies to	Current or former Board Director, employees, suppliers or contractors (including their employees) or other person recognised under applicable whistleblower legislation.			

Policy context	
This policy relates to:	
Commonwealth and state legislation	<i>Australian Commonwealth Acts</i> • Corporations Act 2001 • Taxation Administration Act 1953 • Fair Work Act 2009 • Aged Care Act 2024 • Privacy Act 1988 <i>Queensland Acts</i> • Work Health and Safety Act 2011 • Anti-Discrimination Act 1991 • Public Interest Disclosure Act 2010 <i>NSW Acts</i> • Privacy and Personal Information Protection Act 1998 • Work Health and Safety Act 2011
Regulatory requirements (Standards)	<i>Strengthened Aged Care Quality Standards</i> Standard 2 The Organisation Outcome 2.6 Complaints and Feedback Management <i>Human Services Quality Standards</i> Standard 5 Feedback, Complaints and Appeals Indicator 5.1 <i>National Safety and Quality Mental Health Standards for Community Managed Organisations</i> Standard 1 Practice Governance Feedback and Complaints Management and Resolution (1.11, 1.12, 1.13 and 1.14) <i>National Safety and Quality Digital Mental Health Standards</i> Standard 1 Clinical and Technical Governance Safety and Quality Systems (1.11, 1.12, 1.13 and 1.14)
Best practice standards	ASIC Regulatory Guide 270 – Whistleblower Policies
Organisational policies	• POL-003 Privacy and Confidentiality Policy • POL-015 Workplace Health and Safety Policy • POL-007 Incident Management Policy • POL-006 Feedback and Complaints Management Policy • POL-002 Code of Conduct Policy • POL-009 Conflict of Interest Policy • POL-014 Safeguarding and Protection Policy
Forms, templates and other organisational documents	• PRO-004 Feedback, Complaints and Whistleblower Management Procedure



Purpose

Footprints is committed to operating with integrity, transparency and accountability and to creating an environment where people can raise serious concerns safely and without fear of retaliation.

This Policy establishes Footprints' commitment to protecting people who speak up about serious wrongdoing and sets out the legal protections and governance principles that apply to whistleblower disclosures.

Footprints will comply with applicable whistleblower protections under the Corporations Act 2001 (Cth), Taxation Administration Act 1953 (Cth) and Aged Care Act 2024 (Cth), together with any other legislation applying to its services and operations.

The Feedback, Complaints and Whistleblower Management Procedure (PRO-004) sets out how potential whistleblower disclosures are received, assessed, managed and responded to.

Scope

Whistleblower protections may apply to a range of people connected with Footprints, including current and former:

employees and officers;

- contractors, suppliers and their employees;
- volunteers;
- associates; and
- certain family members and dependants of these people.

Additional people may be protected in relation to particular Footprints services or activities.

A person does not need to determine whether they legally qualify as a whistleblower before raising a concern. Footprints will assess the circumstances and ensure any applicable protections are maintained.

A disclosure may be made anonymously.

1.0 Our Commitment

Footprints encourages people to speak up where they have reasonable grounds to suspect serious wrongdoing.

A person does not need to prove that wrongdoing has occurred before raising a concern. A concern raised on reasonable grounds will be taken seriously even if it is ultimately not substantiated.

Footprints will:

- provide safe and accessible ways to raise concerns;
- assess concerns according to their substance, regardless of how they are described;
- protect confidentiality and the identity of whistleblowers as required;
- accept anonymous disclosures;
- protect people from victimisation, retaliation and detrimental conduct;
- provide appropriate support;
- manage conflicts of interest;
- ensure concerns are considered objectively and fairly;
- treat people named or affected by disclosures fairly; and



- use identified risks and findings to strengthen governance and organisational practice.

2.0 Whistleblower Disclosure

A whistleblower disclosure generally involves a reasonable concern about serious wrongdoing or improper conduct relating to Footprints, its people, services or operations.

This may include suspected:

- fraud, theft, bribery, corruption or serious dishonesty;
- serious financial misconduct or misuse of Footprints funds or assets;
- serious or systemic breaches of legal or regulatory requirements;
- serious governance failures or abuse of authority;
- serious conflicts of interest involving misuse of position;
- conduct creating a serious risk to the health or safety of a person or the community;
- serious wrongdoing relating to the delivery of Footprints services;
- deliberate concealment or manipulation of information relating to serious wrongdoing; or
- retaliation or victimisation associated with raising a whistleblower concern.

Whistleblower protections may also apply to particular concerns relating to Footprints' tax affairs, aged care and mental health services and other regulated activities.

Footprints may choose to manage another serious integrity concern through its whistleblower framework even where statutory whistleblower protections do not apply.

3.0 Personal Work-Related Grievances and Other Concerns

Not every complaint, workplace concern or disagreement is a whistleblower matter.

Personal work-related grievances will generally be managed through Footprints' relevant people and culture processes. These may include concerns about:

- interpersonal conflict;
- recruitment, promotion or transfer decisions;
- terms and conditions of employment;
- performance management;
- disciplinary decisions;
- changes to duties or reporting arrangements; or
- suspension or termination of employment.

However, a workplace matter may still be a whistleblower concern where it involves serious wrongdoing, has broader implications for Footprints or involves retaliation because someone has raised or may raise a protected concern.

A matter may involve more than one Footprints process. Where this occurs, Footprints will determine the most appropriate way to manage the matter while maintaining any whistleblower protections that apply.

4.0 Making a Disclosure

A whistleblower concern can be raised verbally or in writing. A person does not need to use a particular form or use the term whistleblower.

Footprints' preferred internal reporting pathways are:



- the Chief Executive Officer;
- a General Manager; or
- the Chair of the Board.

A person is not required to raise a concern with someone who is involved in the matter or has a conflict of interest.

Where the concern relates to:

- the Chief Executive Officer, it should be raised with the Chair of the Board;
- a Board Director, it should be raised with the Chair of the Board; or
- the Chair of the Board, it should be raised with another non-conflicted Director.

These internal reporting pathways do not prevent a person from making a disclosure to an external person, regulator or authority where permitted by law.

A person may also seek independent legal advice about making a disclosure or the protections available to them.

5.0 Anonymous Disclosures

A person may make a whistleblower disclosure anonymously and may choose to remain anonymous throughout the process where permitted.

Footprints will take anonymous concerns seriously and will not disregard a disclosure simply because the person's identity is unknown.

Where possible, Footprints will establish a safe way to communicate with an anonymous whistleblower.

Remaining anonymous may sometimes limit Footprints' ability to clarify information, provide updates or fully investigate a concern.

6.0 Confidentiality and Protection of Identity

Footprints will protect the identity of a whistleblower and information likely to identify them in accordance with applicable legal requirements.

A whistleblower's identity will only be disclosed where they consent or where disclosure is otherwise permitted or required by law.

Information about the concern may need to be shared where reasonably necessary to assess or respond to the matter. Where this occurs, Footprints will take reasonable steps to avoid unnecessarily identifying the whistleblower.

Footprints cannot guarantee that a person's identity will never be inferred from the circumstances surrounding a disclosure. Reasonable steps will be taken to minimise this risk.

Unauthorised disclosure of protected whistleblower information may constitute serious misconduct and may also have legal consequences.

7.0 Protection from Victimisation and Detriment

Footprints will not tolerate retaliation, victimisation, threats or other detrimental treatment because a person has raised, may raise or is suspected of raising a whistleblower concern.

This may include:

- dismissal, demotion or other adverse employment action;



- discrimination, harassment, intimidation or threats;
- deliberate isolation or exclusion;
- physical or psychological harm;
- damage to a person's reputation, property or financial position; or
- disadvantage in employment, development or promotional opportunities.

Reasonable management action taken for legitimate reasons unrelated to a whistleblower disclosure is not victimisation or detrimental conduct.

Footprints will take reasonable steps to identify and manage risks to a whistleblower and other people who may be affected by a disclosure.

Anyone who believes they have experienced or been threatened with retaliation or detrimental conduct should raise the concern promptly through a non-conflicted reporting pathway.

8.0 How Footprints Will Respond

Footprints will consider each disclosure according to its individual circumstances.

Potential whistleblower disclosures will be handled carefully and confidentially and assessed to determine the appropriate response.

Depending on the circumstances, this may include:

- addressing immediate safety or other risks;
- providing support or protective arrangements;
- seeking further information;
- undertaking an internal or independent investigation;
- obtaining specialist or legal advice;
- notifying a regulator or other authority where required; or
- taking other appropriate corrective or organisational action.

A disclosure will not automatically result in a formal investigation.

9.0 Fair Treatment

Footprints will treat everyone involved in a whistleblower matter fairly and respectfully.

An allegation will not be treated as established simply because it has been reported.

A person who is the subject of material allegations will be given sufficient information to understand and respond to those allegations before adverse findings are made. This does not generally require Footprints to disclose the identity of the whistleblower.

Footprints will also consider appropriate support for people affected by a disclosure or investigation.

Nothing in this section prevents Footprints from taking reasonable interim action where necessary to manage safety, safeguarding, regulatory, integrity or operational risks.

10.0 Outcomes and Organisational Learning

Where wrongdoing or other concerns are identified, Footprints will take action appropriate to the circumstances.

This may include addressing identified risks, improving systems or practices, providing additional training or support, taking appropriate employment action, making required notifications or referring a matter to an external authority.



Where reasonably practicable, the whistleblower will be advised when the matter has been finalised and may be provided with general information about the outcome. Footprints will not disclose another person's confidential employment, disciplinary or personal information.

Themes, systemic risks and improvement opportunities identified through whistleblower matters will contribute to Footprints' risk management, quality and continuous improvement activities.

11.0 Deliberately False Information

A disclosure is not false or malicious simply because it is not substantiated.

People who have reasonable grounds for a concern can raise it without fear that an unsubstantiated outcome will itself result in adverse action.

Deliberately fabricating allegations, knowingly providing materially false information or intentionally falsifying evidence may constitute misconduct and may be addressed under applicable Footprints policies and procedures.

12.0 Additional Requirements for Aged Care Services

Footprints will maintain accessible whistleblower arrangements for its funded aged care services that meet applicable aged care requirements.

People receiving aged care services, their supporters, aged care workers and responsible persons will be provided with appropriate information about how to raise concerns and the protections available to them.

Aged care whistleblower concerns may be raised verbally, in writing or anonymously.

Where a person can choose to have their concern managed through Footprints' feedback and complaints process, any whistleblower protections that apply will continue to be maintained.

13.0 Governance and Responsibilities

The Board:

- provides oversight of Footprints' whistleblower policy and significant whistleblower matters;
- receives appropriately de-identified information about whistleblower activity, themes and systemic risks; and
- ensures appropriate arrangements are available for concerns involving the Chief Executive Officer, Directors or Board Chair.

The Chief Executive Officer:

- promotes a culture where serious concerns can be raised safely;
- ensures Footprints maintains an effective whistleblower framework; and
- ensures significant organisational risks arising from whistleblower matters are appropriately managed and escalated.

Leaders and managers:

- recognise and appropriately escalate concerns that may involve serious wrongdoing or whistleblower protections;
- protect confidentiality;
- appropriately manage conflicts of interest; and



- do not undertake informal enquiries that could compromise the whistleblower or the integrity of the process.

All team members:

- maintain appropriate confidentiality;
- do not victimise or disadvantage anyone because of an actual or suspected disclosure;
- cooperate appropriately with authorised enquiries or investigations; and
- seek guidance if they receive information that may be a whistleblower disclosure.



Revision history

Version no	Date commenced	Change description	Review date	Policy owner		Authorised by (CEO or Board)
				Position title	Functional Area	
1	22 September 2026	Initial version (policy only) replacing previous Whistleblower Policy and Procedure	22 September 2028	CEO	Office of CEO	Board