

Policy #	Title	Date Adopted
6.71	WHISTLEBLOWER POLICY	15.12.25

WHISTLEBLOWER POLICY & PROCEDURE

1.0 PURPOSE AND SCOPE

This policy helps people safely report wrongdoing at Well Life Services (WLS). If you see or experience something that doesn't match our policies or procedures, we want everyone to feel safe to speak up if they see something wrong. This policy explains:

- What you can report
- How to report it
- How we will protect you

We follow the Corporations Act 2001 and other laws to make sure your report is handled properly on a timely basis.¹

This Policy is important in helping identify wrongdoing that otherwise would not have been uncovered without the protections granted by the Act which are detailed below.

Who does this policy apply to?

This Policy applies to individuals who are, or have been, any of the following in relation to WLS:²

- (a) An officer or worker;
 - Including permanent, full time, fixed term, casual, or temporary roles, interns, managers and Directors.
- (b) A supplier of services to WLS (paid or unpaid) and their workers
 - Including contractors, consultants, service providers and business partners.
- (c) An associate of WLS and
- (e) A relative, dependant or spouse of an individuals listed in (a)-(c).

The individuals listed above are eligible to make a disclosure which may qualify for protection under the Act (collectively referred to as 'eligible whistleblowers').

2.0 DEFINITIONS

See Appendix A

PROCEEDURE

3. What You Can Report (Eligible Disclosures)³

You can report serious wrongdoing, including:

- Fraud or stealing
- Unsafe practices
- Serious misconduct

¹ RG 270.40

² RG 270.43, *Corporations Act 2001* (Cth) s 1317AAA, *Taxation Administration Act* (Cth) s 14ZZU.

- Breaches of privacy or confidentiality
- Abuse, neglect, or harm
- Any behaviour that puts people, clients, property, or Well Life Services at risk

If you are not sure whether something counts — you can still report it. We will help you work out the next steps.

Workers can raise personal work grievances via **6.7 Personal Grievance Policy**. Workers may want to consider seeking external legal advice about their rights under employment and contract law.

False Reports

WLS discourages the reporting of deliberate false reporting, which may delay the investigation of valid disclosures. Any false reporting will be treated seriously and may be subject to reporting to appropriate authorities.

4. WHO CAN MAKE A DISCLOSURE

WLS encourages eligible whistleblowers with a disclosable matter to make a disclosure to WLS as the first port of call so that wrongdoing can be identified and addressed in a timely manner.

Anyone connected to Well Life Services can speak up, including:

- Workers and contractors
- Clients and family members who see wrongdoing
- Former workers







Your visa status, literacy level or employment type does not affect your right to be protected.

How to Make a Disclosure

An eligible whistleblower (called a discloser) can report concerns inside WLS or outside the organisation. We encourage all disclosers to use the **formal whistleblower channels** listed below to ensure they are protected.

You can make a disclosure in any of these ways:

- Stopline (External Reporting Service) ⁴
 - [Stopline Case Manager - https://makeareport.stopline.com.au/portal/landing/welllife](https://makeareport.stopline.com.au/portal/landing/welllife)

 <p>Phone</p> <p>Please call Stopline on 1300 30 45 50 to talk to one of the team.</p> <p><i>Stopline operates independently of Well Life Services so we will need to gain as much information as possible to ensure the matter can be investigated by Well Life Services.</i></p>	 <p>Email</p> <p>If you would like to write an email to Stopline, please address it to: makeareport@stopline.com.au</p> <p><i>Please ensure you let us know if you are wanting to be anonymous to Well Life Services.</i></p>	 <p>QR Code</p> 	 <p>Post</p> <p>If you would like to write a letter to Stopline, please address it to Well Life Services c/o Stopline Pty Ltd, PO Box 403, Diamond Creek VIC 3089</p> <p><i>Please ensure you let us know if you are wanting to be anonymous to Well Life Services.</i></p>	 <p>NRS – National Relay Service</p> <p>The NRS is a vital service that allows people who are d/Deaf, hard of hearing or have a speech impairment to make and receive phone calls.</p>
---	--	---	--	--

⁴ RG 270.72.

- Any one of the following trained WLS Disclosure Officers to qualify for protection:

WLS Disclosure Officers:	CEO
	Head Of Operations
	Training, Compliance and WHS Officer
	Corporate Services Officer
	Practice Manager & Staff Supervisor

You can ask for:

- A translator
- Support from someone you trust
- A private meeting

Who Can Receive a Disclosure Outside Well Life Services?

Sometimes a person may feel uncomfortable or unsafe reporting directly to Well Life Services. The law allows eligible whistleblowers to make a disclosure to certain people outside WLS and still receive full legal protection.

An eligible whistleblower can make a disclosure to one of the following individuals to qualify for protection:

- **Lawyer**

You can speak to a lawyer **at any time** to get advice or help about a disclosure.

- Even if the lawyer decides the issue does not fully meet the legal definition of wrongdoing, you may still be protected⁵.

- **Regulatory Bodies**

You can report directly to a regulator. This includes:

- [ASIC](#)
- NDIS Quality and Safeguards Commission
- NISQ Agency
- Queensland Child Protection Services body (body prescribed by regulation)

These bodies can investigate serious wrongdoing, and you are protected under the Whistleblower Act (Section 12) when reporting to them.

- **Public Interest Disclosure⁶**

Disclosures can be made to a journalist or parliamentarian if:

- You have already reported the issue to a regulator, and
- At least 90 days have passed, and
- You believe it is in the public interest.

See Appendix A for full definition.

- **Emergency Disclosure^{7 8}**

Disclosures can be made to a journalist or parliamentarian if:

- You have previously reported to a regulator, and
 - There is a serious and immediate risk to safety or the environment.
- See Appendix A for full definition.

⁶ S 1317AAD. RG 270.74.

⁷ RG 270.76

⁸ S 1317AAD. RG 270.74.

5. MAKING A DISCLOSURE⁹

Whistleblowers who are unsure of the process or protections, can contact Stopline for confidential advice at any time using the contact information in section 4.

If concerns are raised with someone other than:

- the people listed in Section 4, or
- Stopline, or
- the approved external recipients listed in Section 6,

the discloser may not receive the legal protections described in Section 7 of this policy.

6. Legal protections for disclosures¹⁰

Disclosers who fulfil the criteria outlined in points 1-4 have the following legal protections available to them for both internal and external disclosures¹¹:

A. Protection of a Discloser's Identity¹²

WLS has a legal obligation to protect the confidentiality of a discloser's identity.

Names, or any information that may reveal who the discloser is, **cannot** be shared unless:

- The discloser agrees, or
- the law requires it (for example, reporting to ASIC, the Australian Federal Police, a prescribed body, or speaking to a lawyer for legal advice).

A person can disclose the information contained in the disclosure with or without the discloser's consent if:

- The information **doesn't** include the disclosers identity;
- WLS has taken all reasonable steps to reduce the risk that the discloser will be identified from the information; and
- It is reasonably necessary for investigating issues mentioned in the disclosure

It is illegal for a person to identify a discloser or disclose information that is likely to lead to the identification of the discloser. If this has occurred, you can

- lodge a confidential complaint via Stopline.
- A complaint may be lodged with a regulator (e.g., ASIC or ACNC).

Anonymity

Eligible Disclosers can make a disclosure anonymously (without giving their name) and still be protected from harm or unfair treatment. Disclosers may also use a pseudonym.

An eligible discloser can choose to remain anonymous:

- Whilst making a disclosure;
- During the investigation;
- After the investigation ends.

⁹ S 1317AI(5)(b).

¹⁰ RG 270.41, *Corporations Act 2001* (Cth) s 1317AI(5)(a).

¹¹ S 1317AI(5)(a).

¹² RG 270.90 – RG270.94

A discloser can refuse to answer any questions which could reveal who they are.

Emails or messages that don't identify the sender will be treated as anonymous disclosures.

B. Protection from detrimental acts or omissions¹³

No one is allowed to treat a discloser badly because they spoke up. A person cannot engage in conduct that causes detriment to a discloser (or another person) in relation to a disclosure because they:

- made a disclosure,
- may make a disclosure, or
- someone thinks they might make a disclosure.

This includes both actual actions and threats (spoken or implied).

Detrimental conduct, which is prohibited under law includes:

- Being fired or demoted including unreasonable changes of position or duties
- Discrimination between a Whistleblower and other workers
- Harassment or intimidation
- Harm or injury to a person, property or reputation
- Damage to a person's business or financial position
- Any other damage

Detrimental conduct does not include:

- Reasonable administrative action taken to protect the discloser from detriment
- Reasonable management action related to unsatisfactory work performance

If any administrative or management action is taken, the discloser will be told why.

C. Compensation and other remedies¹⁴

A discloser (or any other worker or person) can seek compensation and other remedies through the courts if:

- They suffer loss, damage or injury because of a disclosure, and
- WLS failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Anyone considering compensation or legal remedies should seek independent legal advice.

D. Civil, criminal and administrative liability protection

A discloser is protected from:

- Civil liability - for example, being sued for breaching confidentiality or an employment contract
- Criminal liability - for example, being prosecuted for releasing information as part of the disclosure
- Administrative liability – such as disciplinary action

These protections do not apply if the disclosure is false.

They also do not protect a discloser from consequences for their own misconduct that is uncovered during the disclosure process.

¹³ RG 270.95 – RG270.101

¹⁴ S 1317AD RG 207.102 RG 207.103

7. SUPPORT AND PRACTICAL PROTECTION FOR DISCLOSURES

WLS is committed to supporting disclosers and protecting disclosers from detriment throughout the disclosure process.¹⁵

When you make a disclosure:

- We take it seriously
- We keep your identity private as much as the law allows
- We assess the report as quickly as possible
- We treat everyone with respect and fairness
- We take action when wrongdoing is found
- We will keep you updated throughout the process unless it creates legal or safety risks.

A. Protection of a discloser's identity¹⁶

Receiving a disclosure

- Personal details or references that could identify the discloser will be removed.
- A pseudonym will be used when referring to the discloser.
- Where possible, the discloser will be contacted to clarify parts of their disclosure that reveal their identity.
- Only trained and authorised staff will handle and investigate disclosures.

Record keeping

- All paper and electronic documents and other materials relating to disclosures will be stored securely
- Access to all information relating to a disclosure will be limited to those directly involved in managing and/or investigating the disclosure
- Only essential staff, and only with the discloser's consent, will be told anything that could identify them. Investigation documents will not be sent or printed in ways that could be accessed by other staff. Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements.

B. Protection from detrimental acts or omissions¹⁷

Detriment in the workplace

- WLS will assess any risks of detriment to the discloser or others as soon as a disclosure is made. Protective measures may be put in place, such as temporary relocation or reassignment to an equivalent role.

C. Disclosure Officers must manage conflicts of interest, promote fairness, and assess any risks to the discloser. If a discloser believes they have experienced detriment, they can lodge a grievance with Stopleveline.

D. Personal Wellbeing¹⁸

In some instances, personal wellbeing services may be offered to a discloser, or those subject to detriment including:

¹⁵ S 1317AI(5)(c).

¹⁶ S 1317AI(5)(c), RG 207.106 – RG 207.108.

¹⁷ RG 270.109

¹⁸ Ibid.

- Support services
 - Like counselling or psychologist services
- Strategies to help a discloser minimise and manage stress, workload impacts and other challenges resulting from a disclosure and subsequent investigation
- If personal detriment has occurred WLS may take disciplinary action against any individual who contributed to it.

8. Handling and investigating a disclosure¹⁹

A. Receiving a disclosure

Once WLS (or an authorised service provider such as Stopline) receives a disclosure it will be assessed to determine:

- If the disclosure qualifies for protection under this policy; and
- Whether a formal investigation is required.

B. When and why a disclosure will be investigated

WLS treats every disclosure seriously and with respect. While not all disclosures will lead to a formal investigation, each one will be reviewed carefully before a decision is made.

When deciding whether to investigate, WLS will consider:

- How serious the alleged conduct is
- The quality and detail of information or evidence provided
- Whether the issue appears systemic or ongoing
- Whether similar concerns have been raised before
- Whether the conduct involves Disclosure Officers, major financial concerns or potential non-compliance

If WLS cannot contact the discloser, or the discloser chooses to remain anonymous without providing a safe contact method, an investigation may not be possible. In these cases, WLS may still conduct a broader review of the issues raised.²⁰

C. Investigation Process

WLS is committed to investigations that are fair, objective and independent. If this standard cannot be fulfilled internally by WLS an external investigation will be engaged.²¹ All investigations must comply with the confidentiality requirements outlined in points 6(A) and 7(A).

Disclosure officers will follow the training provided by Stopline available through their Employment Hero located on the Development Tab (online only, not available via the EH Work App).

¹⁹ RG 270.111 -

²⁰ RG 270.119

²¹ Good practice tip RG 270.120

For disclosures that qualify for protection, WLS will follow the below investigation process: ²²	
1. Disclosure received	A trained person at Well Life Services (called a Disclosure Officer) will receive a report.
2. Disclosure is Acknowledged	Disclosure Officer will confirm the report is received as soon as possible within 24 hours.
3. Report checked for immediate risks	We look at your report to see if it meets the rules for protection. We also check how serious it is, what information you've given, and if similar things have happened before. We'll also see if it needs a full investigation.
4. Next Steps	If your report doesn't meet the rules or doesn't need a full investigation, we'll talk to you about what happens next or direct you to another process (like the 6.7 Personal Grievance Policy).
5. Investigate if needed	If your report needs a full investigation, a Disclosure Officer or our independent service (Stopline) will look into it. Everyone involved must help with the investigation.
6. We'll keep the discloser updated	Regular updates about what's happening with the report will be shared with the Discloser so long as the discloser can be contacted. ²³
7. Outcome shared	When the investigation is finished, we'll update the discloser (and anyone else involved if appropriate) on what we found out, as much as we're allowed to by law.
8. Close the investigation	We'll finish the investigation and keep records safely.
9. Support	If extra help (like counselling) is needed, we can connect disclosers and other workers or stakeholders as appropriate to professional services.
10. Continuous improvement	We use what we learn from each case to make our processes better in the future.

²² S 1317AI(5)(d)

²³ RG 270.121 – 270.122.

D. Closing the loop on investigations²⁴

A discloser will be provided with regular updates (where they can be updated) including when an investigation:

- begins;
- is underway; and
- has been finalised.

A person subject of an allegation will be provided the:

- information regarding the allegation and the nature of the allegation to the extent that is lawful;
- opportunity to respond; and
- outcome of the investigation or report.

Pending the nature of the disclosure, timelines of when a discloser will be provided an update will vary. The discloser may be informed of the outcomes of an investigation,²⁵ there may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

E. Review²⁶

If a discloser is dissatisfied with the outcome of the investigation the discloser may:

- Request a review by an officer who was not involved in the original investigation, with findings provided to the Risk Committee, or
- Lodge a complaint with ASIC or the ACNC.

WLS is not required to reopen an investigation if it can confirm:

- The investigation was conducted properly
- No new information is available
- Any new information would not change the outcome

9. FAIR TREATMENT OF INDIVIDUALS MENTIONED IN A DISCLOSURE²⁷

WLS is committed to fair treatment of its workers who are mentioned in a disclosure that qualifies for protections under the Act, including those who are the subject of a disclosure.

To ensure fair treatment of individuals mentioned in a disclosure:

- Disclosures will be handled confidentially in accordance with point 6(A) and 7(A)
- Each disclosure will be assessed as to whether the conduct listed warrants an investigation. The investigation is conducted to determine whether there is sufficient evidence to substantiate the claims made in the disclosure.
- Investigations will be objective, fair and independent as outlined in point 8.
- A worker will have the contents of the disclosure put to them as required by principles of procedural fairness and prior to any action being taken.
- A worker who is subject of a disclosure may access personal wellbeing services outlined in point 7(c).

²⁴ RG 270.121 – 270.122.

²⁵ RG 270.123 - 124

²⁶ RG 270.123-124

²⁷ RG 270.125-126

10. ACCESSIBILITY²⁸

This policy will be made publicly available via WLS Staff Portal and website.

WLS will conduct staff training sessions on this policy as required to ensure that workers are aware of this Policy. Training to all levels of management will occur to ensure that they are equipped on how to deal with disclosures.

11. ROLES AND RESPONSIBILITIES

See Appendix B

12. REFERENCES

- Corporations Act 2001 (Cth), Part 9.4AAA – Whistleblower Protections
- ASIC Regulatory Guide 270 – Whistleblower Policies
- Australian Charities and Not-for-profits Commission (ACNC) Governance Standards
- Fair Work Act 2009 (Cth)
- NDIS Act 2013 (Cth)
- NDIS (Quality and Safeguards) Commission reporting obligations
- Human Services Quality Framework (HSQF)
- Public Interest Disclosure Act 2013 (Cth) (for reference only; WLS is not a Commonwealth agency but elements are relevant)
- Privacy Act 1988 (Cth)
- Stopline – Whistleblower Service Provider Guidelines
- WLS Internal Policies – Code of Conduct, Complaints Management Policy, Personal Grievance Policy, Incident Reporting Framework, Conflict of Interest Policy, Records and Information Management Policy.

13. RELATED DOCUMENTS

- 1.2 Privacy Policy
- 6.3 Code of Conduct
- 6.7 Personal Grievance Policy
- Risk Management Framework (SharePoint > WLS Home > Company Documents > Risk Management)

14. REVIEW OF POLICY

Policies will be reviewed on a two-yearly basis. However, if at any time the legislative, policy or funding environment is so altered that the policy is no longer appropriate in its current form, the policy will be reviewed immediately and amended accordingly.

15. VERSION CONTROL

Version	Review Date	Changes Made	Reviewed By	Next Review Date
1.0	12.12.25	New policy	Corporate Services Manager	12.12.27
1.1	15.12.25	Slight edits, formatting and Approval	CEO	15.12.27

²⁸ RG 270.128 - 133

16. APPENDIX A - DEFINITIONS

Term	Definition
Detriment	Any harm, discrimination, harassment, or adverse action taken against a whistleblower as a result of their disclosure.
Discloser	An eligible whistleblower who makes a disclosure
Disclosable Matter	<p>An eligible whistleblower is able to make a disclosure relating to a 'disclosable matter.'²⁹</p> <p>A disclosable matter must fulfil the following criteria:</p> <ul style="list-style-type: none"> (1) The eligible whistleblower must have reasonable grounds to suspect conduct in point 3(iii) has occurred. <ul style="list-style-type: none"> a. ASIC suggests an allegation with no supporting information is not likely to have 'reasonable grounds to suspect'³⁰; and (2) The conduct outlined in (3) relates to WLS or a related body corporate of WLS³¹; and (3) Disclosable conduct which is: <ul style="list-style-type: none"> (i) Misconduct <ul style="list-style-type: none"> a. Negligence, breach of trust, or breach of duty (ii) Illegal such as; <ul style="list-style-type: none"> a. Theft, dealing in, or use of illicit drugs or violence or threatened violence b. Fraud, money laundering or misappropriation of funds c. Offering or accepting a bribe d. Financial irregularities e. Failure to comply with, or a breach or legal or regulatory requirements; and f. Engaging in or threatening to engage in detrimental conduct against an eligible whistleblower who has made a disclosure or is believed or suspected to make or planned to make a disclosure. (iii) Conduct that is an offence against, or a breach of <ul style="list-style-type: none"> a. <i>Corporations Act 2001</i> (Cth) b. <i>Banking Act 1959</i> (Cth) (iv) An offence against an Australian Commonwealth law (law which is not state governed law) which is punishable by imprisonment for 12 months or more; or

²⁹ *Corporations Act 2001* (Cth) s 1317AA.

³⁰ RG 270.53

³¹ RG 270.51

	<ul style="list-style-type: none"> (v) Business behaviour and practices that may cause consumer harm; or (vi) Improper state of affairs or circumstances; or (vii) Represents a danger to the public or financial system; or (viii) As prescribed by regulation.
Disclosure Officer(s)	A person appointed by WLS to receive whistleblower disclosures, ensure confidentiality, assess eligibility for protection, and coordinate investigation processes. Disclosure Officers are responsible for safeguarding the whistleblower's identity, preventing detriment, and ensuring compliance with legal and organisational requirements.
Eligible Whistleblower	As defined in 1.1 Who does this policy apply to?
Emergency Disclosure	<ul style="list-style-type: none"> • An emergency disclosure can be made where <u>all of the below criteria is met</u>: <ul style="list-style-type: none"> ○ An eligible whistleblower has made the disclosure to ASIC, ACNC or another Commonwealth body (prescribed by regulation); ○ The eligible whistleblower 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 the natural environment; ○ Before making a public interest disclosure, the eligible whistleblower has given written notice to ASIC, ACNC or another Commonwealth body (prescribed by regulation) that identifies their original disclosure, and outlines that they intend to make an emergency disclosure; and ○ The extent of the information disclosed is no greater than necessary to inform the journalist or parliamentarian of the substantial and imminent danger.³² <p>Before making a public interest or emergency disclosure it is important to ensure all of the above criteria is met. A Worker may wish to seek external legal advice from a lawyer prior to making this type of disclosure.³³</p>
False Reporting/Reports	False Reporting refers to the deliberate act of making a disclosure or allegation that the person knows is untrue or misleading. In the context of a Whistleblower Policy, this means:

³² RG 270.76

³³ RG 270.78

	<ul style="list-style-type: none"> • The individual intentionally provides incorrect information about misconduct, illegal activity, or other disclosable matters. • The report is made with the knowledge that the allegations lack factual basis or evidence. • False reporting can undermine genuine disclosures, delay investigations, and may result in disciplinary action or referral to appropriate authorities. <p>Key distinction: False reporting is different from an honest mistake or a disclosure made in good faith that later proves incorrect. Protections under whistleblower laws apply to disclosures made with reasonable grounds, even if the allegations are not substantiated.</p>
Pseudonym	A pseudonym is a made-up name that a person can use instead of their real name. If you want to report something but don't want to share who you are, you can use a different name (a pseudonym) to help protect your identity. This means you can still make a report and be protected, even if you don't want anyone to know your real name.
Public Interest Disclosure	<p>A public interest disclosure can be made where <u>all the below criteria is met</u>:</p> <ul style="list-style-type: none"> • At least 90 days have passed since the eligible whistleblower made the disclosure to ASIC, ACNC or another Commonwealth body (prescribed by regulation); • The eligible whistleblower doesn't have reasonable grounds to believe that action is being, or has been taken; • The eligible whistleblower has reasonable grounds to believe making another disclosure is in the public interest; and • Before making a public interest disclosure, the eligible whistleblower has given written notice to ASIC, ACNC or another Commonwealth body (prescribed by regulation) that identifies their original disclosure, and outlines that they intend to make a public interest disclosure.³⁴
Reasonable Grounds	<p>Reasonable Grounds refers to having a rational basis for a belief or suspicion, supported by facts or circumstances, even if the information is not fully proven. In the context of whistleblower protections:</p> <ul style="list-style-type: none"> • The person making the disclosure honestly believes the information indicates misconduct, illegal activity, or a breach of duty.

³⁴ RG 270.75

	<ul style="list-style-type: none"> • The belief is based on objective facts or observations, not mere speculation or unfounded assumptions. • ASIC guidance notes that an allegation with no supporting detail is unlikely to meet the “reasonable grounds” threshold. <p>Key point: Reasonable grounds do not require the whistleblower to have evidence that would stand up in court—just enough credible information to justify the suspicion.</p>
The Entity	The Entity in the context of this Whistleblower Policy refers to WLS, including any related body corporate as defined under the Corporations Act 2001 (Cth).
Workers	<p>Refers to any individual who carries out work in in the business or undertaking of WLS. This includes:</p> <ul style="list-style-type: none"> • Employees (full-time, part-time, casual) • Volunteers • Students on placement • Agency staff <p>It may include other persons who carries out work in the business or undertaking of WLS. For clarity, a contractor engaged by WLS to perform construction and / or other trade or supply works for example is not another person carrying out work in the business or undertaking of WLS. All Workers are expected to uphold Well Life’s values, comply with relevant legislation and policies, and contribute to a safe, inclusive, and respectful environment for children, young people, participants, colleagues, and the community.</p>

17. APPENDIX A - DEFINITIONS

Role	Responsibilities
Associate of WLS	<ul style="list-style-type: none"> An Associate is anyone who has a close connection to WLS, even if they are not an employee or contractor. This includes: <ul style="list-style-type: none"> Clients who receive services from WLS Participants in any of our programs or activities Young people supported by WLS Business partners, consultants, or anyone who works with or alongside WLS in a formal way Associates are included as people who can make a protected report if they see or suspect wrongdoing at WLS.
CEO	<ul style="list-style-type: none"> Providing visible leadership that encourages a “speak up” culture across WLS. Ensuring the policy is implemented effectively and consistently across the organisation. Acting as an authorised Disclosure Officer and responding to disclosures in line with legal and policy obligations. Ensuring adequate resourcing for secure reporting channels, investigations, confidentiality protections and staff training. Coordinate organisation-wide responses to media or journalists relating to whistleblowing matters, ensuring communications are accurate, timely and protect confidentiality. Reporting systemic issues, significant risks or non-compliance to the Board where appropriate.
Executive Team	<ul style="list-style-type: none"> Championing a safe environment where staff feel supported to report concerns early. Ensuring operational areas follow this Policy, including the protection of disclosers and appropriate record-keeping and training for workers. Supporting Disclosure Officers with timely action, risk assessment, and escalation where required. Addressing any cultural, systemic, or process issues identified through disclosures. Ensuring their own conduct demonstrates the standards and integrity expected at WLS.
Managers / Supervisors	<ul style="list-style-type: none"> Reinforcing a supportive environment where workers feel comfortable raising concerns. Ensuring team members understand the Policy and offer training on Whistleblowing policy and procedure. Identifying, managing and escalating concerns that may indicate wrongdoing. Supporting disclosers, including taking reasonable steps to protect them from detriment.

	<ul style="list-style-type: none"> • Maintaining confidentiality and ensuring any documentation is managed securely. • Cooperating fully with investigations and implementing recommended improvement actions. • Redirecting staff who raise personal work grievances to the appropriate internal process (Personal Grievance Policy).
Disclosure Officers	<ul style="list-style-type: none"> • Act as authorised internal recipients of disclosures. • Receive disclosures confidentially and determine whether Stopline or another regulatory body should be notified. • Assess initial information to help determine whether the matter qualifies for protection. • Ensure disclosures are managed sensitively, securely and in line with the Act. • Coordinate or support investigation processes while maintaining strict confidentiality. • Keep secure and accurate records relating to disclosures and investigations. • Monitor and address risks of detriment to the discloser. • Provide updates to the discloser (where possible) on the progress of a disclosure. • Recommended training or continuous improvements as appropriate.
Workers	<ul style="list-style-type: none"> • Speak up about wrongdoing, risks, or conduct inconsistent with WLS values. • Make disclosures honestly and in good faith. • Report disclosures to Stopline or an authorised Disclosure Officer rather than investigating matters themselves. • Maintain confidentiality and avoid discussing disclosures with others. • Cooperate respectfully with any investigation. • Treat colleagues or clients who make disclosures with respect and avoid any behaviour that could cause detriment. <p>When a client shares a concern Staff must support the client to access a clear channel for raising their concern. This may include:</p> <ul style="list-style-type: none"> • Explaining the difference between a grievance and a protected disclosure, in plain language, so the client can choose the appropriate pathway. • Providing a copy or link to the Whistleblower Policy, available on the Well Life Services website. • Offering to help the client contact a Disclosure Officer or our independent whistleblowing service Stopline, if they prefer an external and confidential option.

- Supporting the client to put their concern in writing if they ask for assistance, without altering or interpreting their words.
- Keep all client concerns private and only share information with authorised personnel who are responsible for managing disclosures.

Reassure the client that their information will be handled sensitively and in line with the protections available under the Whistleblower provisions.