

WHISTLEBLOWER PROTECTION AND DISCLOSURE POLICY

1. PURPOSE AND SCOPE

- 1.1 The purpose of this Whistleblower Policy (Policy) is to encourage honest reporting of any misconduct or wrongdoing in the Organisation and to protect individuals who make such disclosures.
- 1.2 This Policy outlines how individuals can safely express their concerns regarding Reportable Conduct (as defined in this Policy) and how the Organisation will support individuals so that they know whom to contact, how to make a report and the protections available to them as a Whistleblower.
- 1.3 This Policy applies to all individuals who may make or receive a disclosure, under the *Aged Care Act 2024* (Aged Care Act), including all Aged Care Workers, volunteers, individuals accessing funded aged care services (FACS) (our clients, customers and recipients of FACS) and their Supporters or Representatives who are afforded protections and will be collectively called Eligible Whistleblowers or Eligible Recipients, as applicable.
- 1.4 This Policy applies to all employees, officers, volunteers, vendors, suppliers, contractors, or relatives, spouses or dependents of any of these persons captured under the *Corporations Act 2001 (Cth)* (Corporations Act) who are afforded protections and will be collectively called Eligible Whistleblowers or Eligible Recipients, as applicable.
- 1.5 This Policy does not replace any statutory mandatory reporting requirements to report an act of misconduct or wrongdoing.
- 1.6 This Policy does not cover personal work-related grievances as defined under section 2.4 of this Policy.

☒ All

<input type="checkbox"/> Children Youth and Families	<input type="checkbox"/> Seniors Living	<input type="checkbox"/> Housing Services	<input type="checkbox"/> Integrated Communities
<input type="checkbox"/> Churches of Christ Foundation	<input type="checkbox"/> Mission	<input type="checkbox"/> Commercial Services	<input type="checkbox"/> Council of Churches
<input type="checkbox"/> CEO and Board		<input type="checkbox"/> Executive Group and Senior Leadership	

2. POLICY STATEMENT

2.1 What is whistleblowing?

- The reporting or disclosure by a Whistleblower of alleged misconduct or wrongdoing (Reportable Conduct) occurring within the Organisation. See [Appendix A](#) for a summary of the lines of reporting within this Organisation.

2.2 Who is a Whistleblower?

- A Whistleblower is anyone external or internal who discloses Reportable Conduct.

2.3 What can be reported? (Reportable Conduct)

- A disclosure is protected under the Aged Care Act when it is disclosed orally or in writing to a person described in this policy as an Eligible Recipient and the discloser has reasonable grounds to suspect that the information included in the disclosure indicates that a person may have contravened a provision of the Aged Care Act; Note:
 - A Whistleblower may elect to have a disclosure managed as a complaint or feedback under the Aged Care Act. If a Whistleblower makes this election, they will not be afforded the additional protections under section 548 of The Act, set out in this Policy. A record of the Discloser's consent to use one of these methods of reporting must be recorded by the Eligible Recipient.

- A disclosure is protected under the Corporations Act where it is made by an Eligible Whistleblower to an Eligible Recipient and the Eligible Whistleblower has reasonable grounds to suspect that the information included in the disclosure concerns:
 - Misconduct (as defined in this Policy) or an improper state of affairs including in relation to tax affairs of the Organisation;
 - Contravention of the *Corporations Act 2001* or the *Australian Securities and Investments Commission Act 2001*; or is a contravention of any other Commonwealth laws that are punishable by imprisonment for a period of 12 months or more;
 - Financial malpractice or fraud, such as engaging in questionable accounting practices, dishonestly altering organisational records, money laundering, misappropriation of funds, corruption, offering or accepting a bribe, or any other serious wrongdoing;
 - Illegal activity, such as theft, illicit drug use, modern slavery, violence or criminal damage to property;
 - Conduct that involves significant risk or danger to the public or to the employees of the Organisation;
 - Improper Conduct or unethical behaviour that may cause serious financial or non-financial loss to the Organisation.
- A Whistleblower is obliged to act in good faith and have reasonable grounds to suspect or believe that the disclosure is of Reportable Conduct.

2.4 Excluded matters

- While the Organisation encourages everyone to report concerns, not all types of concerns are intended to receive protections through this Policy. The following matters, for the purpose of the Corporations Act, are generally not intended to be covered by this Policy:
 - Customer/Client/Participant complaints (non-Aged Care Act related): If you are a client/customer/participant and have concerns with any product or service provided by the Organisation, please raise your concerns online via the Organisation's feedback page - <https://www.cofc.com.au/feedback> or speak to a manager of the Organisation.
 - Personal work-related grievances: If you are a current or former employee of the Organisation and want to report a grievance that directly affects you personally in the context of your employment with the Organisation, please refer to the *Grievance Procedure* or contact the Organisation's People Services division. Examples of personal work-related grievances include an interpersonal conflict between the discloser and another employee; a decision about the engagement, transfer or promotion of the discloser; or a decision to suspend or terminate the engagement of a discloser. Notwithstanding the above stated, a personal work-related grievance may be raised under this Policy if it is in relation to the detrimental treatment suffered by a Whistleblower as a consequence of having made a Whistleblower Report except in cases where the action does not constitute detrimental Conduct as set out in section 2.10 of this Policy.
- Disclosures that do not amount to Reportable Conduct under this Policy will not qualify for protection under the Whistleblower Laws. In such cases, the Whistleblower will be redirected to other appropriate policies, procedures or reporting mechanisms that may assist them.

2.5 Eligible Recipients

- For the Aged Care Act under this Policy, Reportable Conduct can be disclosed to an Eligible Recipient. The Act provides protection when disclosing to the following entities:

- Aged Care Workers (employees, contractors and volunteers) and Responsible Persons (Board, Executive Group, Seniors Living line management and Seniors Living site management) of the organisation or another Registered Provider of care services to the organisation.
- Appointed Commissioner or a member of the staff of the Commission, the Department of Health and Aged Care, a Police Officer or an Independent Aged Care Advocate.
- For the Corporations Act under this Policy, Reportable Conduct can be disclosed to an Eligible Recipient. The Organisation authorises the following roles, thus protection, as Eligible Recipients:
 - Chair of the Board;
 - Any member of the Executive Group;
 - Whistleblower Protection Officer (WPO) as defined in this Policy;
 - General Manager, Risk and Assurance;
 - Internal auditors of the Organisation;
 - For tax-related disclosures – Chief Commercial Officer.
 - External auditors, Australian Securities and Investments Commission (ASIC), the Australian Taxation Office (ATO) or a Commonwealth authority prescribed to receive disclosures.
 - Under certain circumstances as defined in this Policy, a Public Interest Disclosure or an Emergency Disclosure can be disclosed to a journalist or a parliamentarian. This may only be done for disclosures under the Corporations Act. The Whistleblower is encouraged to seek independent legal advice before making a Public Interest Disclosure or an Emergency Disclosure.
- A Whistleblower must make a report to an Eligible Recipient to qualify for protections under the Whistleblower Laws. If a Whistleblower chose to disclose to an external Eligible Recipient, then the disclosure will be subject to that external body's process that our organisation may have no visibility of.
- A report made to a legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the Whistleblower Laws also qualifies for protections under the Whistleblower Laws.

2.6 How can I make a report?

- A Whistleblower Report can be submitted in several ways to our organisation. Review in [Appendix A](#) to this policy a "Summary of Reporting lines" you may consider.

2.7 Anonymous Reporting

- A Whistleblower may choose to remain anonymous when making a Whistleblower Report, including by using a pseudonym and still qualify for protection under the Whistleblower Laws. They may also choose to have any individual named in the disclosure to also remain anonymous.
- There is no requirement for the Whistleblower to identify themselves at any stage during the reporting or investigation process. A Whistleblower may also refuse to answer questions that they feel could reveal their identity or the identity of a named individual in their report that they requested to also remain anonymous.
- The Organisation will respect the Whistleblower's right not to identify themselves. However, anonymous Whistleblowers should recognise that there may be some practical limitations in properly conducting the investigation if the report is anonymous. Anonymity may also mean that it is difficult for the Organisation to provide feedback on the investigation status to the Whistleblower. In any case, the Organisation is committed to fairness, and every effort will be made to satisfactorily address the whistleblower report irrespective of the reporting mechanism chosen by the Whistleblower.

2.8 What happens after a whistleblower report is submitted?

- The Organisation takes all reports and disclosures made under this Policy seriously.
- All Whistleblower Reports will be escalated to the WPO or the Chief Executive Officer (CEO), as applicable.
- Should the WPO or CEO be implicated with the reported matter, they would not receive the report.
- The WPO will conduct preliminary enquiries to determine whether the report qualifies for protection under this Policy and if an investigation is required.
- The WPO will assess the risk of victimisation, discrimination or detriment that could be inflicted in relation to the Whistleblower before considering further actions.
- The WPO will also consider whether to appoint an internal or external investigator to investigate the Whistleblower Report depending on the nature of the Reportable Conduct.

2.9 Investigations of reports and disclosures

- An objective, fair and independent investigation will be conducted under the coordination of the Whistleblower Investigation Officer (WIO) to determine whether there is enough evidence to substantiate or refute the Whistleblower Report.
- When considering an investigation, the WIO will need to determine:
 - The nature and scope of the investigation;
 - The person(s) within and or outside the Organisation that should be involved in the investigation;
 - The nature of any technical, financial or legal advice that may be required to support the investigation; and
 - The timeframe of the investigation.
- In certain circumstances, the Organisation may not be able to undertake a complete investigation if it is not able to contact the Whistleblower to get more information.
- As soon as practicable after the investigation is conducted, the WIO will provide a report to the WPO which outlines the findings, outcomes and recommendations.
- The WPO assigned to the report will provide the Whistleblower with regular updates of the progress of the investigation and the outcome if the Whistleblower's identity is provided at the time of making the report or disclosure. The frequency and timeframe of these updates will depend on the nature of the Reportable Conduct.
- A person accused within or connected to the matter will not be involved in the investigation.
- The Organisation recognises that employees or officers of the Organisation who are included in Whistleblower Reports under this Policy also need to be treated fairly. This will include confidentiality, procedural fairness and natural justice as part of the investigation process.
- Where, as a result of investigating a disclosure, evidence is found which confirms any claims or allegations of misconduct or contravention of a regulatory instrument on the part of an individual identified in a disclosure, action may then be taken against that individual.

2.10 Support and protection for Whistleblowers

- All Whistleblower Reports will be considered confidentially, and appropriate protections will be available to Whistleblowers, including their right to be safe from any form of detrimental conduct resulting from a Whistleblower Report made under this Policy.
- The Organisation prohibits any victimisation, discrimination, harassment or detrimental conduct against Whistleblowers. Any such detrimental conduct by the Organisation's employees may result in disciplinary action, up to and including termination of employment.
- A Whistleblower will not be subject to any civil, criminal or disciplinary action for making a Whistleblower Report under this Policy or for participating in any subsequent investigation. However, the Whistleblower or any individual may still be subject to civil or criminal liability for any conduct that is revealed by the disclosure.
 - The Corporations Act contains an additional protection so that information in a disclosure is not admissible as evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty (other than where the proceedings relate to the falsity of the information).
- If a Whistleblower believes that their Whistleblower Report has not been sufficiently dealt with or that their confidentiality has been breached, they may raise this with the WPO or any other Eligible Recipient.
- A Whistleblower who believes they have been penalised or disadvantaged, including being subjected to victimisation, discrimination, harassment or other detrimental conduct, as a result of their Whistleblower Report should immediately report the same to the WPO or any other Eligible Recipient.
- The Organisation does not tolerate any form of detrimental conduct taken by any person against a Whistleblower or any people who have been involved in the investigation of a Whistleblower Report. For the purpose of this Policy, detrimental Conduct is negative action taken against any person who, in good faith, makes a Whistleblower Report and, as a result, suffers a detriment.
- Examples of detrimental Conduct can include but are not limited to:
 - Dismissal of an employee or alteration of an employee's position/duties to their disadvantage;
 - Negative performance feedback that is not reflective of actual performance;
 - Harassment, intimidation or bullying;
 - Harm or injury to a person;
 - Discrimination between an employee and other employees of the same employer;
 - Damage to a person's property, reputation, business, financial position or any other damage to a person.
- Examples of actions that are not detrimental conduct may include:
 - Managing a Whistleblower's unsatisfactory work performance in line with the Organisation's performance management framework;
 - Administrative action that is reasonable to protect the Whistleblower from detriment/harm. (e.g., moving a Whistleblower who has made a report about their immediate work area to another office to prevent them from detriment).
- A whistleblower who believes that they are subject to detrimental conduct as a result of their Whistleblower Report should report this to the WPO or any other Eligible Recipient.

2.11 Identity Protection (Confidentiality)

- The Organisation will treat all Whistleblower Reports in a confidential and sensitive manner and will not disclose anything that leads to the identification of the Whistleblower unless:
 - it is reasonably necessary for the purpose of investigating the matter in which case all reasonable steps will be taken to reduce the risk of the Whistleblower being identified;
 - the information is disclosed to a legal practitioner to obtain legal advice or representation;
 - the disclosure is required by law;
 - the disclosure is to prevent a serious threat to health, safety or well-being of another individual. In addition, for Corporations Act the disclosure is to prevent serious threat to property;
 - the disclosure is made with the written consent of the Whistleblower;
 - the information disclosed by the Organisation is de-identified, and all reasonable steps have been taken to remove the Whistleblower's identity or any information that is likely to lead to the Whistleblower being identified.
- Access to all information relating to a Whistleblower Report will be limited to those directly involved in managing and investigating the Whistleblower Report.
- The WPO will ensure that each person handling or investigating a Whistleblower Report will be reminded about the confidentiality requirements, including that unauthorised disclosure of a Whistleblower's identity may be a criminal offence.
- Unless the Whistleblower provides consent to disclose their identity for the purpose of the investigation, any personal information or reference to the Whistleblower must be redacted from communications. The Whistleblower must be referred to in a gender-neutral context.
- All paper and electronic documents and other materials relating to Whistleblower Reports, inquiries, investigations and their outcomes and any decisions or recommendations made must be stored securely by the WIO and WPO in the organisation's record keeping system.
- When a disclosure or report is investigated, it may be necessary to reveal certain information to other internal or external stakeholders. If this is required, all reasonable steps will be taken to protect the identity of the Whistleblower.
- Unauthorised disclosure of information that could prejudice the confidentiality and/or the identity of the Whistleblower is a breach of this Policy and will be regarded seriously, resulting in disciplinary action if required.

2.12 Obligations of Eligible Recipients receiving report or disclosure

- If any of the Eligible Recipients receive a Whistleblower Report, they must immediately notify the WPO, who will assist them in understanding and complying with their obligations in relation to the Whistleblower Report, especially the confidentiality obligations.
- An Eligible Recipient who receives a Whistleblower Report must at all times keep confidential the identity of the Whistleblower and any other information that is likely to identify the Whistleblower.
- If any of the Eligible Recipients, including the WIO or WPO, believe that they may have a conflict of interest by being involved in investigating a Whistleblower Report, they must immediately notify another Eligible Recipient and cease to be involved in the investigation.

2.13 Accessibility of this Policy

- This Policy is made available to all staff on the Organisation's intranet site.

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- This Policy is publicly available via the Organisation's website.
- This Policy is publicly available via the external disclosure reporting service provider's website:
 - <https://cofc.stoplinereport.com/>
- When requested, this Policy is to be translated into another language or be presented in a format that our aged care recipients or their supporter would understand how our system works.
- A person seeking legal advice with respect to their obligations under this Policy or the Whistleblower Laws must contact an external lawyer for advice.
- Awareness and reliable implementation of this Policy is to be widely and regularly communicated through:
 - appropriate training to the organisation's Eligible Whistleblowers and Eligible Recipients on how this policy operates as specifically required by the applicable regulatory instrument;
 - training provided to the organisation's Aged Care Workers, Responsible Persons and Eligible Recipients at regular intervals, which must be at least annually, at onboarding, when there is a change in the whistleblower system or a change in the forementioned persons role that effects their responsibilities under this Policy; and
 - an appropriate monthly communication that explains the organisation welcomes disclosers. This communication is for the Organisation's Aged Care Workers, Responsible Persons, persons receiving funded aged care services and their supports, and any other person who registers a request to be kept informed about this Policy.

3. PRINCIPLES

Roles, Responsibilities and Accountabilities

Staff

- 3.1 Responsible for abiding by the statements laid out in this policy, using its subordinate Procedures and Supporting Documents to guide their practice.

Endorsement and Approval

- 3.2 This Policy is supported by roles and responsibilities in adherence to the following:

Policy Review Priority	Accountable	Responsible	Consulted	Informed
<input checked="" type="checkbox"/> High	<input checked="" type="checkbox"/> Board	<input checked="" type="checkbox"/> CEO	Via Quality Compliance Coordinator	All workforce.
<input type="checkbox"/> Medium				Persons receiving funded aged care services and their support person.
<input type="checkbox"/> Low				

Compliance, Monitoring and Review

- 3.3 This Policy is reviewed every year or sooner where relevant legislation is updated or the organisation position changes.
- 3.4 Breaches to this Policy may result in investigation, disciplinary action, and reporting to the Executive / Board.

Reporting and Records Management

- 3.5 No additional record keeping is required.
- 3.6 Staff must maintain all records relevant to administering this Policy in a recognised Churches of Christ in Queensland record keeping system.

4. DEFINITIONS AND TERMINOLOGY

Term	Definition
Accountable	The person who has ultimate ownership of a policy. Ownership cannot be transferred.
Consulted	The people who contribute valuable subject matter expertise to the development/review of the policy.
Eligible Whistleblower	<p>Anyone who becomes aware of a misconduct or wrongdoing in the organisation is encouraged to report a disclosure. The disclosure will be appropriately assessed and concluded.</p> <p>However, for whistleblower legislative protection the Aged Care Act and Corporations Act have different definitions of the phrases Eligible Whistleblower and Eligible Recipient that Whistleblower's wanting that protection need to be aware of.</p>
Emergency Disclosure	<p>The disclosure of information to a journalist or parliamentarian, where:</p> <ol style="list-style-type: none"> 1. The Whistleblower has previously made a disclosure to ASIC, ATO or another Commonwealth body; 2. The Whistleblower has reasonable grounds to believe that the information concerns substantial and imminent danger to the health or safety of one or more persons or to the natural environment; 3. Before making the emergency disclosure, the Whistleblower has given written notice to the body to which the previous disclosure was made that: <ul style="list-style-type: none"> ○ includes sufficient information to identify the previous disclosure; and ○ states that the Whistleblower intends to make an emergency disclosure. 4. The extent of the information disclosed in the emergency disclosure is not greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.
Funded Aged Care Services (FACS)	Care and support services that are subsidised by the Australian Government to help older people live independently, either at home or in residential aged care facilities. Collectively, aged care services provided by the organisation as a Registered Provider (that excludes retirement living services).
Informed	The people expected to remain informed and have knowledge of the policy. In this Policy the Aged Care Act requires regular communication and offering of information about the organisation's whistleblower service to certain external persons who engage with us.
Misconduct	Misconduct includes but is not limited to fraud, negligence, default, breach of trust, duty and code of conduct.

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Organisation	Means Churches of Christ in Queensland Group of Entities including Churches of Christ in Queensland, Churches of Christ Housing Services Limited and all Churches of Christ subsidiary entities.
Public Interest Disclosure	<p>The disclosure of information to a journalist or a parliamentarian, where:</p> <ol style="list-style-type: none"> 1. At least 90 days have passed since the Whistleblower made the disclosure to ASIC, ATO or another Commonwealth body; 2. The Whistleblower does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure; 3. The Whistleblower has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and 4. Before making the public interest disclosure, the Whistleblower has given written notice to the body to which the previous disclosure was made that: <ul style="list-style-type: none"> ○ includes sufficient information to identify the previous disclosure; and ○ states that the Whistleblower intends to make a public interest disclosure.
RACI	A matrix describing the participation by various roles in completing tasks or deliverables in support of business processes.
Responsible	Person(s) who is implement the process and monitor compliance.
Whistleblower	A Whistleblower is anyone who is aware of any suspected wrongdoing or misconduct in the Organisation and wishes to make a report or disclosure in connection with such misconduct or wrongdoing through the whistleblower reporting system. For the purposes of this Policy a Whistleblower can be anyone external or internal.
Whistleblower Investigation Office (WIO)	Any person(s) as nominated by the Whistleblower Protection Officer who has sufficient and appropriate capability to understand and deliver the investigation process.
Whistleblower Protection Office (WPO)	<p>For the Aged Care Act, the Executive General Manager Operations or General Manager Seniors Living Business operations or their delegate(s).</p> <p>For the Corporations Act and other regulatory instruments excluding the Aged Care Act, the Executive General Manager Legal and Governance or their delegate(s).</p> <p>Whistleblowers are requested make a report through independent external disclosure service provider Stopline. Direct communication with a WPO can be made by telephoning 07 3327 1600.</p>
Whistleblower Report	<p>Is a report or disclosure about a wrongdoing made by an eligible Whistleblower to an Eligible Recipient that qualifies for protection under the Whistleblower Laws.</p> <p>For Aged Care Act purposes, a report is preferred to be made through Stopline Portal or may be through the organisation's complaints and feedback system. If the latter, (additional) s548 protection for the Discloser is not available. These <i>latter Disclosers</i> are referred to as <i>Complainants</i> to avoid confusion.</p> <p>— For Corporations Act and other regulatory environment purposes a report is preferred to be made through the Stopline Portal.</p> <p>Appendix A of this Policy offers a variety of reporting lines that may be used.</p>

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5. RELATED LEGISLATION AND DOCUMENTS

Category	Related Reference Document(s)
Related Churches of Christ in Queensland Policies	Child Safety and Wellbeing Policy Code of Conduct Policy Complaints, Feedback and Appeals Policy Data Breach Policy Declaration of Conflict of Interest Policy Fairness at Work Policy Governance Principles Internal Audit Policy Modern Slavery Policy Person of Concern Policy Privacy Policy
Related Legislation, Industry Standards and Care Standards	Aged Care Act 2024, particularly Chapter 7, Part 5; Aged Care Act revised explanatory memorandum Aged Care Quality and Safety Commission (ACQSC) Aged Care Rules 2025, particularly Chapter 4, Part 10, Division 2, Subdivision D; ASIC Information Sheet 238 & 239; ASIC Regulatory Guide 270 ASIC Regulatory Guide 270 Australian Prudential Regulation Authority (APRA) Australian Securities and Investments Commission Act 2001 (Cth) (ASIC) Banking Act 1959 (Cth), refer Banking exemption No.1 of 2021, Religious charitable development funds, Banking Act 1959 Corporations Act 2001 (Cth) Corporations Act 2001, particularly Volume 5, Chapter 9, Part 9.4AAA; Financial Sector (Collection of Data) Act 2001 (Cth); Insurance Act 1973 (Cth); Life Insurance Act 1995 (Cth); National Consumer Credit Protection Act 2009 (Cth); Superannuation Industry (Supervision) Act 1993 (Cth); Taxation Administration Act 1953 (Cth) Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 as an amendment to the Corporations Act 2001
Related Churches of Christ in Queensland Procedures, Supporting Documents and references	Child Safe Reporting Child Sexual Abuse Procedure Complaints and Appeals Management Procedure Conflict of Interest Declaration Procedure Feedback, Suggestions and Compliments Procedure

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[Feedback, Complaints and Appeals Procedure - HS](#)

[Gifts Declaration Procedure](#)

[Grievance Procedure](#)

[Whistleblowing and Disclosure Procedure](#)

6. FEEDBACK

- 6.1 Feedback related to this document can be submitted by the following:
- Internal workforce is invited to open a Quality Support Ticket by selecting 'Enquiry'.
 - External engaged persons are invited to provide Feedback via the Churches of Christ in Queensland website.

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7. APPENDIX A – SUMMARY OF REPORTING LINES

	Child	Our Clients	Our People			Our Organisation
	Child Safety	External	Safety	Corporate feedback/ Incidents	Grievance	Whistleblowing
Focus	To report behaviours that impact the safety of children	To report concerns with any product or service provided by the Organisation	To report incidents involving actual or potential injury, ill-health, near miss or loss to employees, volunteers, visitors, contractors, and property at all organisation locations	To support good governance and sound decision making.	To report work-related conduct or performance concerns or grievances	To report concerns regarding Reportable Conduct
Why Compliance	External Legal Requirement: <ul style="list-style-type: none"> • on individuals S13E • On CofC • Criminal Code National Principals 	<ul style="list-style-type: none"> • Aged Care Laws • NDIS Provider laws • Funding agreements with Commonwealth / State 	<ul style="list-style-type: none"> • Work Health and Safety Laws • Environment Laws 	Funding agreements with Commonwealth / State	<ul style="list-style-type: none"> • Employment Legislation • Industrial Instruments (Awards / Enterprise Agreements) • CofC Policies and Procedures 	<ul style="list-style-type: none"> • Aged Care Act • Aged Care Act Rules • Corporations Law
Why Cultural	Child Safety Management Plan	Complaints Management Systems	WHS Management Plan	Risk Management Systems	<ul style="list-style-type: none"> • Code of Conduct • Fairness at Work 	<ul style="list-style-type: none"> • Code of Conduct • Management Plans not effective • People not following Management Plan

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						<ul style="list-style-type: none"> • People not following Policy / Procedure
System Owner	Child Safety	Each Business Services Area: <ul style="list-style-type: none"> • Seniors Living • Children, Youth and Families • Facilities and Infrastructure • Housing Services 	Health, Safety & Wellbeing	Risk Management	Employment Relations	Legal & Governance
Board Committee	<ul style="list-style-type: none"> • Board • Governance & Risk 	<ul style="list-style-type: none"> • Board • Governance & Risk 	<ul style="list-style-type: none"> • Board • Mission, People and Culture 	<ul style="list-style-type: none"> • Board • Governance & Risk 	<ul style="list-style-type: none"> • Board • Mission, People and Culture 	<ul style="list-style-type: none"> • Board • Governance & Risk
How	A Child Safe Report can be submitted in the following ways through the externally managed whistle-blower reporting line: https://cofc.stoplinereport.com/ <ul style="list-style-type: none"> • Phone: 1300 30 45 50 • Email: makeareport@stopline.com.au 	<ul style="list-style-type: none"> • Feedback Improvement Form or • visiting www.cofc.com.au/feedback or • sending an email to feedback@cofcqld.com.au 	Log the notifiable incident into CofCQ relevant database system e.g. RiskMan * If unable to log the incident into the relevant database system due to technical issues, immediately advise the Health, Safety & Wellbeing Team (HSW), who will then log the incident. healthandsafety@cofcqld.com.au	Log the notifiable incident into CofCQ relevant database system e.g. RiskMan	<ol style="list-style-type: none"> 1. In the first instance report to upline supervisor or Manager – in-person/email/phone; and/or 2. Guidance from HR Support – hrsupport@cofcqld.com.au or phone 07 3327 1694 	A Whistle-blower Report can be submitted in the following ways through the externally managed whistle-blower reporting line: https://cofc.stoplinereport.com/ <ul style="list-style-type: none"> • Phone: 1300 30 45 50 • Email: makeareport@stopline.com.au

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	<ul style="list-style-type: none"> • QR Code: via Smartphone  <ul style="list-style-type: none"> • Post: Attention: Churches of Christ in Queensland, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia • National Relay Service <p>Or</p> <p>All workforce via safeguarding@cofcqld.com.au</p>		<p>HSW Lead mobile: +61 456 746 203</p>			<ul style="list-style-type: none"> • QR Code: via Smartphone  <ul style="list-style-type: none"> • Post: Attention: Churches of Christ in Queensland, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia • National Relay Service • If requested, a Translating and Interpreting Service (TIS National) can be provided • Aged Care Act Disclosers may also use the Complaints Management System, but (additional) s548 protections are not available this method.
Rules	<ul style="list-style-type: none"> • Person of Concern Policy (incl churches) 	<ul style="list-style-type: none"> • Complaints, Feedback and Appeals Policy 	<ul style="list-style-type: none"> • Health Safety and Wellbeing Policy 	Risk Management Framework	<ul style="list-style-type: none"> • Code of Conduct Policy 	<ul style="list-style-type: none"> • Whistleblower Protection and Disclosure Policy

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	<ul style="list-style-type: none"> • Child Safety and Wellbeing Policy (Incl churches) • Queensland Criminal Code (229BC) Failure to report belief of child sexual offence committed in relation to child 	<ul style="list-style-type: none"> • Complaints and Appeals Management Procedure • Feedback, Suggestions and Compliments Procedure • Feedback, Complaints and Appeals Procedure - HS 	<ul style="list-style-type: none"> • Health and Safety Incident Management Procedure 		<ul style="list-style-type: none"> • Fairness at Work Policy • Grievance Procedure • Managing Underperformance and Misconduct Procedure 	<ul style="list-style-type: none"> • Code of Conduct Policy • Declaration of Conflict of Interest Policy • Gifts Received and Disclosure Policy
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8. REVIEW AND APPROVAL DETAILS

Review	Details
Policy Author and Position	Legal & Governance Group
Consulted	Chief Commercial Officer General Managers Seniors Living, General Manager Seniors Living Business Operations General Manager Technology Manager Seniors Living Governance Manager Legal and Compliance Internal Audit Manager Quality, Assurance and Compliance Committee

Authority Approval	Date of Meeting
Endorsed by Executive Group	22/10/2026
Endorsed by Council	NA
Approved by Board	22/10/2025

Revision History	Details
Original version date	04/07/2022
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Next review date	22/10/2026