

## Whistleblower Policy and Protocol

### 1. Introduction

- 1.1. Epworth has a framework for receiving, investigating and reporting to the Board of Management's Audit and Risk Committee on Protected Disclosures. Epworth's whistleblower policy and protocol has been publicly accessible on the Epworth website [www.epworth.org.au](http://www.epworth.org.au) since 2015 and subsequently updated to reflect legislated corporate whistleblower protections in Australia that came into effect in 2019.
- 1.2. Information about whistleblower protections under the *Corporations Act 2001* (Cth) and the *Tax Administration Act 1953* (Cth) is available from ASIC and the ATO (refer References).
- 1.3. This Whistleblower Policy and Protocol is comprised of two parts:
  - (a) sections 2 to 10 of this document outline the policy (i.e. what persons and disclosures are protected); and
  - (b) sections 11 and 12 set out the protocol (i.e. how Protected Disclosures are received, handled and investigated).

## Part 1: Policy

### 2. Policy Statement

- 2.1. This Whistleblower Policy and Protocol meets the requirements of a whistleblowing policy under Part 9.4AAA of the *Corporations Act 2001* (Cth).
- 2.2. This Whistleblower Policy and Protocol is available to officers and employees of the Epworth Group via Epworth's internal Policy Management System and accessible to disclosers within or outside the entity on the Epworth website [www.epworth.org.au](http://www.epworth.org.au).

### 3. Purpose of the Policy

- 3.1. Epworth is committed to fostering a culture of ethical behaviour and good governance. Whistleblowing, the act of raising concerns about misconduct within and organisation, is a key element of any governance system's transparency and accountability framework.
- 3.2. The purpose of this Whistleblower Policy and Protocol is to help:
  - (a) detect and address unacceptable conduct;
  - (b) provide a positive and open working environment;
  - (c) provide a framework for rising, investigating and reporting Protected Disclosures in connection with an entity in the Epworth Group;
  - (d) provide a framework for the protection of the rights of Protected Persons under the relevant laws; and

(e) provide a framework for the protection of VMOs making Protected Disclosures under this Whistleblower Policy and Protocol.

3.3. This Whistleblower Policy and Protocol does not replace other Epworth policies and protocols and is intended to complement normal communication channels between managers and staff.

#### **4. Who the Policy Applies To: Protected Persons and VMOs**

4.1. This Whistleblower Policy and Protocol applies to:

- (a) a current or former officer or employee of an Epworth Group entity (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers and directors);
- (b) a supplier of services or goods to an Epworth Group entity (whether paid or unpaid), including their employees (e.g. current and former agency staff, volunteers, contractors, consultants, service providers and joint venture partners);
- (c) a current or former board member of an Epworth Group entity; and
- (d) a relative, dependant or spouse of an individual in paragraphs (a) to (c) above (e.g. relatives, dependants or spouse of current and former employees, contractors, consultants, service providers, suppliers and joint venture partners),

**(Protected Person).** Protected Persons are eligible for protection under this Whistleblower Policy and Protocol.

4.2. Whilst Visiting Medical Officers may not fall within the definition of 'protected persons' under the *Corporations Act 2001* (Cth) and the legislative protections may not apply, Epworth recognises the close relationship between Visiting Medical Officers and the Epworth Group and encourages Visiting Medical Officers to make Protected Disclosures. Accordingly, this Whistleblower Policy and Protocol also applies to;

- (a) a current or former Visiting Medical Officer or other clinicians exercising rights of private practice at an Epworth hospital; and
- (b) a relative, dependant or spouse of an individual in paragraph (a),

**(VMOs).** VMOs are eligible for protection under this Whistleblower Policy and Protocol.

4.3. Persons outside the categories at paragraph 4.1 and 4.2 above (such as members of the public, donors, patients and visitors) are not eligible for protection under this Whistleblower Policy and Protocol.

4.4. Persons not eligible for protection under this Whistleblower Policy and Protocol may raise concerns by utilising the feedback/complaints procedures on the Epworth website [www.epworth.org.au/who-we-are/get-in-touch](http://www.epworth.org.au/who-we-are/get-in-touch).

#### **5. Matters the Policy Applies To: Protected Disclosures**

5.1. This Whistleblower Policy and Protocol applies to concerns raised by a Protected Person or VMO who has reasonable grounds to suspect serious misconduct by any person has or is occurring in relation to an entity in the Epworth Group (**Protected Disclosure**). Examples of serious misconduct that may qualify as a Protected Disclosure include:

- (a) falsifying Medicare and health fund claims;
- (b) falsifying donation receipts;
- (c) offering or accepting a bribe;
- (d) theft or obtaining property by deception;
- (e) unlawfully accessing health information and medical records;
- (f) misconduct and improper conduct in relation to tax affairs;
- (g) assault and violence;
- (h) modern slavery;
- (i) wage theft;
- (j) illicit drug taking and dealing;
- (k) deliberate or reckless significant risk to public safety; and
- (l) threatening a person planning to make a disclosure.

- 5.2. Serious misconduct may, but not necessarily, involve a breach of laws or regulations.
- 5.3. Suspected serious misconduct may involve employees, consultants, volunteers, suppliers, contractors or other external parties or agencies in the course of engaging with or doing business with an entity in the Epworth Group including visiting medical officers, government representatives and donors.
- 5.4. A Protected Person or VMO does not need to prove their allegations of serious misconduct but the concern must be reasonably held and cannot be speculative.
- 5.5. A Protected Person or VMO can still qualify for protection if a Protected Disclosure is not substantiated following investigation.
- 5.6. A Protected Person or VMO is not protected from the consequences of their own wrong-doing in making a Protected Disclosure.
- 5.7. Personal work-related grievances such as interpersonal workplace conflicts, managerial decisions including staff rostering, decisions that do not involve a breach of workplace laws, or terms and conditions of employment are not Protected Disclosures and are outside the scope of this Whistleblower Policy and Protocol.
- 5.8. Personal work-related grievances may be Protected Disclosures within the scope of this Whistleblower Policy and Protocol where the concerns raised include:
- (a) an allegation of serious misconduct (refer examples in paragraph 5.1);
  - (b) an allegation that an entity in the Epworth Group has breached employment or other laws punishable by imprisonment by a period of 12 months or more; or
  - (c) the grievance includes victimisation due to whistleblowing.

- 5.9. Other comments or concerns that are not Protected Disclosures and fall outside the scope of this Whistleblower Policy and Protocol may be raised by utilising the feedback/complaints procedures on the Epworth website [www.epworth.org.au/who-we-are/get-in-touch](http://www.epworth.org.au/who-we-are/get-in-touch).

## 6. Who Can Receive a Protected Disclosure?

- 6.1. A Protected Person can make a report directly to regulatory bodies, or other external parties, about a Protected Disclosure and qualify for protection under the *Corporations Act 2001* (Cth) without making a prior disclosure to an Epworth Group entity. VMOs may not qualify for the protection under the *Corporations Act 2001* (Cth) but will be afforded the other protections granted under this under this Whistleblower Policy and Protocol.
- 6.2. Epworth encourages Protected Persons and VMOs to make Protected Disclosures to one of Epworth's Eligible Recipients in the first instance to assist in early identification and investigation of serious misconduct.
- 6.3. Whether a report is made to an entity in the Epworth Group, to qualify for protection under this Whistleblower Policy and Protocol and the *Corporations Act 2001* (Cth) (or the *Taxation Administration Act 1953* (Cth) where relevant), the report must be made directly to an Eligible Recipient.
- 6.4. Eligible Recipients are:
- (a) members of the Board of Management and directors of companies in the Epworth Group;
  - (b) members of the Group Executive;
  - (c) the Internal Auditor or the External Auditor (including a member of an audit team conducting an audit); and
  - (d) the Disclosure Officer.
- 6.5. Disclosures by Protected Persons to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the *Corporations Act 2001* (Cth) (or the *Taxation Administration Act 1953* (Cth) where relevant) are protected, even in the event that the legal practitioner concludes that a disclosure is not a Protected Disclosure.
- 6.6. Disclosures of information relating to Protected Disclosures can be made by a Protected Persons to ASIC or another Commonwealth body prescribed by regulation and qualify for protection under the *Corporations Act 2001* (Cth) (or the *Taxation Administration Act* where relevant). Information about disclosure outside the Epworth Group is available from ASIC (refer References).
- 6.7. Under certain circumstances Protected Disclosures can be made to a journalist or parliamentarian and qualify for protection (where made to ASIC or another Commonwealth body prescribed by regulation at least 90 days prior). It is important for a Protected Person to understand the criteria for making a public interest or emergency disclosure and should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.
- 6.8. Before making any report, whether to an Eligible Recipient or to an external party, an individual may seek additional information from Epworth's Disclosure Officer or an independent legal adviser about this Whistleblower Policy and Protocol and protections under the *Corporations Act 2001* (Cth) (or the *Taxation Administration Act* where relevant).

## 7. Legal Protections for Protected Persons

- 7.1. Protections under the *Corporations Act 2001* (Cth) are available to Protected Persons, specifically:
- (a) identity protection (confidentiality);
  - (b) protection from detrimental acts or omissions;
  - (c) compensation and other remedies; and
  - (d) civil, criminal and administrative liability protection,
- apply whether the Protected Disclosure is made to an Eligible Recipient or outside Epworth.
- 7.2. The identity protection available to Protected Person means that a person cannot disclose the identity of a Protected Person or information that is likely to lead to the identification of the Protected Person (which they have obtained directly or indirectly because the Protected Person made a Protected Disclosure) other than:
- (a) to ASIC, APRA, or a member of the Australian Federal Police (within the meaning of the *Australian Federal Police Act 1979* (Cth));
  - (b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the *Corporations Act 2001* (Cth));
  - (c) to a person or body prescribed by regulations; or
  - (d) with the consent of the Protected Person.
- 7.3. A person can disclose the information contained in a Protected Disclosure with or without the Protected Persons consent if:
- (a) the information does not include the discloser's identity;
  - (b) the entity has taken all reasonable steps to reduce the risk that the discloser will be identified from the information; and
  - (c) it is reasonably necessary for investigating the issues raised in the disclosure.
- 7.4. It is illegal for a person to identify a Protected Person, or to disclose information that is likely to lead to the identification of the Protected Person, outside the exceptions listed in paragraphs 7.2 and 7.3 above.
- 7.5. Protected Persons can lodge complaints about a breach of confidentiality with any Eligible Recipient or to a regulator, such as ASIC, APRA or the ATO, for investigation.
- 7.6. A Protected Person will not be subjected to Detrimental Conduct for making a Protected Disclosure.
- 7.7. Detrimental Conduct includes:
- (a) dismissal of an employee;
  - (b) injury of an employee in his or her employment;
  - (c) alteration of an employee's position or duties to their disadvantage;
  - (d) discrimination between an employee and other employees of the same employer;

- (e) harassment or intimidation of a person;
- (f) harm or injury to a person, including psychological harm;
- (g) damage to a person's property;
- (h) damage to a person's reputation;
- (i) damage to a person's business or financial position
- (j) any other damage to a person; or
- (k) a threat (express or implied, conditional or unconditional) to cause detriment,

but does not include:

- (l) administrative action that is reasonable for the purpose of protecting a Protected Person from Detrimental Conduct (e.g. moving a Protected Person who has made a Protected Disclosure about their immediate work area to another office to prevent them from Detrimental Conduct); or
- (m) management action in relation to unsatisfactory work performance of a Protected Person.

7.8. A Protected Person can seek compensation and other remedies through the courts if:

- (a) they suffer loss, damage or injury because of a Protected Disclosure; and
- (b) Epworth fails to take reasonable precautions and exercise due diligence to prevent Detrimental Conduct,

and Protected Persons should seek independent legal advice in such circumstances.

7.9. A Protected Person is protected from any of the following in relation to their Protected Disclosure:

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

7.10. The protections in paragraph 7.9 above do not grant a Protected Person immunity for any misconduct a Protected Person has engaged in that is revealed in their Protected Disclosure.

## **8. Support and Practical Protection for Protected Persons and VMOs**

8.1. Epworth will support Protected Persons and VMOs and protect them from Detrimental Conduct by:

- (a) protecting the confidentiality of the Protected Person's identity. The Disclosure Officer will keep information about the Protected Disclosure in a secured electronic file not accessible to other employees and will not maintain hardcopy documents. The Disclosure Officer will not be a member of the Disclosure Committee and any documentation shared with the Disclosure Committee will have any identifying details redacted;

- (b) protecting Protected Persons and VMOs from Detrimental Conduct. The Disclosure Officer may seek advice from People & Culture on appropriate steps to mitigate any risk of Detrimental Action, recommend administrative action to the Disclosure Committee and offer employee assistance support to a Protected Person; and
- (c) encouraging a Protected Person or VMO to seek independent legal advice if the Protected Person or VMO considers they have been subjected to Detrimental Conduct.

## **9. Ensuring Fair Treatment of individuals mentioned in a Disclosure**

- 9.1. Individuals who are mentioned in a Protected Disclosure will be fairly treated, including those individuals who are the subject of the Protected Disclosure, by ensuring:
- (a) Protected Disclosures are handled confidentially by the Disclosure Committee and its delegates, when it is practical and appropriate in the circumstances;
  - (b) any investigation process is objective, fair and where appropriate, independent;
  - (c) an employee who is the subject of a Protected Disclosure has access to Epworth's employee assistance program throughout an investigation; and
  - (d) the individual who is the subject of the Protected Disclosure is made aware of the conduct of an investigation at the earliest reasonable and appropriate opportunity, but at the latest prior to any adverse finding being made against them.

## **10. Ensuring the Policy is Easily Accessible**

- 10.1. This Whistleblower Policy and Protocol will be published on Epworth's website [www.epworth.org.au](http://www.epworth.org.au).
- 10.2. A link to this Whistleblower Policy and Protocol on the website from Epworth's internal policies and protocols system will be maintained, so that this policy and protocol is easily accessible to employees in the same way other group policies and protocols are internally accessed.
- 10.3. Posters in corporate areas will promote and remind staff of this Whistleblower Policy and Protocol.
- 10.4. This Whistleblower Policy and Protocol is referenced in the [Fraud and Corruption Policy](#) (Linked PP) and [Fraud and Corruption Protocol](#) (Linked PP). This Whistleblower Policy and Protocol will form part of the induction pack for members of the Board of Management, directors of companies in the Epworth Group and members of the Group Executive.
- 10.5. Employees and VMOs will be alerted to updates to this Whistleblower Policy and Protocol in accordance with standard communication processes in relation to policies and protocols updates.
- 10.6. This Whistleblower Policy and Protocol and reports on Protected Disclosures received in any financial year will be made available to the external auditor on request and to the internal auditor in the course of internal audits of fraud and corruption risks.

## Part 2: Protocol

### 11. How to Make a Protected Disclosure

- 11.1. There are a range of internal and external disclosure options, including making Protected Disclosures anonymously, confidentially, securely and outside business hours.
- 11.2. Protected Disclosures to Eligible Recipients may be made in the following ways:
  - (a) by letter to the directors of a company in the Epworth Group, members of the Board of Management, Group Executive or the Disclosure Officer: Epworth HealthCare Corporate Office, c/- 89 Bridge Road, Richmond VIC 3121
  - (b) by email to the Disclosure Officer: [EC-DisclosureOfficer@epworth.org.au](mailto:EC-DisclosureOfficer@epworth.org.au)
  - (c) by email to the Internal Auditor: [lauren.brown@protiviti.com.au](mailto:lauren.brown@protiviti.com.au)
  - (d) by email to the External Auditor: [jafisher@deloitte.com.au](mailto:jafisher@deloitte.com.au)
- 11.3. Protected Disclosures can be made anonymously and still be protected under the *Corporations Act 2001 (Cth)* (or the *Taxation Administration Act* where relevant).
- 11.4. A Protected Person or VMO can:
  - (a) choose to remain anonymous while making a Protected Disclosure, over the course of the investigation and after the investigation is finalised; and
  - (b) refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.
- 11.5. A Protected Person or VMO who wishes to remain anonymous should maintain ongoing two-way communication with Epworth on an anonymous basis so that Epworth can ask follow-up question or provide feedback.
- 11.6. If a Protected Disclosure comes from an email address from which the Protected Person's or VMO's identity cannot be determined, and the Protected Person or VMO does not identify themselves in the email, the Protected Disclosure will be treated as an anonymous disclosure.

### 12. Handling and Investigating a Disclosure

- 12.1. Epworth will receive, consider and investigate Protected Disclosures by reference to the process set out in this Section 12. The process may vary matter to matter to take into account relevant circumstances including to whom the Protected Disclosure was made, employees who may be the subject of the Protected Disclosure and the identity of the Protected Person or VMO.
- 12.2. The timetable for considering and investigating Protected Disclosures will be determined on a case by case basis. If the Protected Person or VMO can be contacted, the Disclosure Officer will keep the Protected Person or VMO advised of the progress of any investigation and when it has concluded.
- 12.3. The Disclosure Officer will maintain records and documentation for each stage of the process, which may involve collecting documentation from the Disclosure Committee and/or its delegates.



**Step 1:**

The Disclosure Officer will determine if the disclosure is a Protected Disclosure.

**Step 2:**

Where a disclosure is assessed not to be a Protected Disclosure, the Disclosure Officer will redirect the report internally for attention (for example a complaint or feedback from a member of the public or a patient) and advise the individual who made the report as to the action taken. Even if a disclosure is not a Protected Disclosure, there may be other Epworth policies and protocols that apply and the person who made the disclosure will be advised of the appropriate reporting avenue if they can be contacted.

**Step 3:**

Where a disclosure is assessed to be a Protected Disclosure, the Disclosure Officer will acknowledge the Protected Disclosure by response to the Protected Person or VMO, refer the Protected Person or VMO to this Whistleblower Policy and Protocol, allocate the Protected Disclosure a reference number, convene a Disclosure Committee and brief the members on this Whistleblower Policy and Protocol and the role and responsibilities of the Disclosure Committee.

The details of the Protected Disclosure, other than the identity of the Protected Person or VMO, are then provided to a Disclosure Committee.

The Disclosure Committee will consider the Protected Disclosure to determine whether to conduct or commission an investigation, with any investigation to be conducted as follows and on the following basis:

- the applicability of other policies and protocols to the investigation process;
- review all claims made, in conjunction with any evidence available;
- investigate and locate any evidence that may substantiate or refute the claims of the Protected Person or VMO (this may include interviewing other persons);
- the person/s against which the allegation has been made will have the opportunity to respond and to provide any material in support of their response and explanation, including attending a meeting with the Disclosure Committee or its delegate, with the opportunity to have a support person in attendance;
- a conclusion will not be reached and a recommendation will not be made until reasonable and appropriate enquiries have been made and submitted material considered;
- the Disclosure Committee may also refer the matter for investigation to an external body or the police if criminal conduct appears to have occurred, and the Board of Management will be advised of any such referral;
- the identity of the Protected Person or VMO will not be shared with the Disclosure Committee without the consent of that individual, to be requested by the Disclosure Officer;
- where the Disclosure Committee is made aware of the identity of the Protected Person or VMO, the investigation process will not involve the sharing of any information by the Disclosure Committee or its delegate that would be likely to indicate, suggest or reveal the identity of the Protected Person or VMO; and

- a Protected Person or VMO may at any time consent to their identity being disclosed in the investigation process and the provision of such consent will not limit or lessen the responsibility of Epworth to protect the Protected Person or VMO from Detrimental Conduct.

The investigation by the Disclosure Committee will be limited where the Protected Disclosure is made anonymously and the Disclosure Officer is not able to contact or obtain further information from the Protected Person or VMO, or the Protected Person or VMO does not consent to their identity being known to the Disclosure Committee or its delegate.

If the Protected Person or VMO can be contacted, they will be provided with regular updates on the progress (i.e. commencement, in progress, concluded) of the Disclosure Committee's consideration or investigation of the Protected Disclosure, at all times with anonymity and identity protection (as applicable) maintained by the Disclosure Officer in the provision of those updates.

**Step 4:**

At the conclusion of an investigation a report will be prepared by the Disclosure Committee. The report will broadly outline the following:

- the details of the Protected Disclosure (but not the identity of the Protected Person or VMO);
- delegates involved in the investigation, employees the subject of the Protected Disclosure or referred to in the Protected Disclosure, external investigators such as independent investigators or the police;
- the information and evidence collected during the investigation that either supports or refutes the allegation of Improper Conduct, including any limitations to the conduct of the investigation;
- the conclusions reached by the Disclosure Committee and the reasoning behind each conclusion;
- whether the Protected Person or VMO should be informed of the conclusions and reasoning (if no recommendation made then the Protected Person or VMO should be informed by the Disclosure Officer only that the investigation has concluded); and
- the recommendation of the Disclosure Committee as to any action to be taken and as to who should be the appropriate decision maker in respect of any such action.

The report is not required to be prepared in any specific format and should be documented and filed in such a way as to maintain confidentiality and identity protection and minimise the risk unauthorised access to the report. For example, the Disclosure Committee may capture the report in email between the Disclosure Committee and the Disclosure Officer.

**Step 5:**

Authority to take any action recommended by the Disclosure Committee will be determined by the nature and extent of the Serious Misconduct substantiated by the Disclosure Committee, and by reference to other Epworth policies and protocols in effect from time to time (for example in relation to delegated authorities, procurement, codes of conduct, disciplinary action, fraud and corruption).

**Step 6:**

The Protected Person or VMO will be informed by the Disclosure Officer when the investigation has concluded.

### Step 7:

The Disclosure Officer will maintain a register of Protected Disclosures, a copy of the report of the Disclosure Committee and actions taken in response to the report.

### Step 8:

The level of reporting to the Board of Management as to Protected Disclosures will be determined by the nature and extent of allegations of Serious Misconduct made in the Protected Disclosures. At a minimum, the Disclosure Officer will prepare a general report as the number and nature of Protected Disclosures received in the relevant financial year to the Audit and Risk Committee of the Board of Management on an annual basis.

## Definitions

<b>ASIC</b>	Australian Securities and Investments Commission
<b>ATO</b>	Australian Taxation Office
<b>Detrimental Conduct:</b>	Refer to paragraph 7.7.
<b>Disclosure Committee:</b>	At least any two of the Group Chief Executive, President of the Board of Management, the Executive Director, People & Culture and the Executive Director having responsibility for the department in which the alleged improper conduct arose.
<b>Disclosure Officer:</b>	The employee of Epworth Foundation in the role of General Counsel.
<b>Eligible Recipients:</b>	Refer to paragraph 6.4.
<b>Epworth:</b>	One or more entities in the Epworth Group or an Eligible Recipient as the context requires.
<b>Epworth Group:</b>	Epworth Foundation, Epworth Medical Foundation Limited, Epworth Arts Foundation Limited and Epworth Geelong Limited.
<b>External Auditor:</b>	Jane Fisher, Partner, Audit and Assurance, Deloitte Touche Tohmatsu.
<b>Internal Auditor:</b>	Lauren Brown, Managing Partner, Protiviti Pty Ltd.
<b>Protected Disclosures:</b>	Refer to paragraph 5.1.
<b>Protected Persons:</b>	Refer to paragraph 4.1.
<b>Serious Misconduct:</b>	means recklessly negligent, deliberate, dishonest, unethical or illegal conduct involving: <ul style="list-style-type: none"><li>• corruption</li><li>• mismanagement of Epworth's resources</li><li>• substantial risk to public health or safety</li><li>• substantial risk to the environment</li><li>• risk to child safety</li></ul>

- modern slavery or other human rights abuses and exploitation, that can form the basis of a report that amounts to a Protected Disclosure, with examples set out in paragraph 5.1.

**Visiting Medical Officers:** means medical practitioners and dentists who are appointed to practice at Epworth pursuant to the Epworth Foundation By-laws.

**VMOs:** Refer to paragraph 4.2.

## Appendices

Nil

## Applicable Legislation

*ASIC Corporations (Whistleblower Policies) Instrument 2019/114*

*Corporations Act 2001 (Cth)*

*Tax Administration Act 1953 (Cth)*

Epworth Group Entity	Basis of application of the whistleblower protection regime in Part 9.4AAA <i>Corporations Act 2001 (Cth)</i>	Exempt from having a whistleblower policy due to annual (consolidated) revenue being less than \$1 million as at the date of this policy
Epworth Foundation	Trading corporation (unconfirmed)	No
Epworth Arts Foundation Limited*	Public company limited by guarantee	Yes
Epworth Geelong Limited*	Public company limited by guarantee	Yes
Epworth Medical Foundation Limited	Public company limited by guarantee	No

## References

Australian Taxation Office. (2019). *ATO Guide on Tax Whistleblowers*. Retrieved from <https://www.ato.gov.au/general/gen/whistleblowers/>

Australian Securities & Investments Commission (ASIC). (2019). *ASIC: INFO 237*. Retrieved from <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>

Australian Securities & Investments Commission (ASIC). (2019). *ASIC; INFO 238: Whistleblower rights and protections*. Retrieved from <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/#what>

Australian Securities & Investments Commission (ASIC). (2019). *ASIC; Regulatory Guide 270 Whistleblower policies (RG 270), November 2019*. Retrieved from <https://asic.gov.au/media/5702691/rg270-published-13-november-2019-20200727.pdf>

## Relevant National Safety and Quality Health Service (NSQHS) Standards 2<sup>nd</sup> Ed.

- |  |  |
|--|--|
| <input type="checkbox"/> Clinical Governance                           | <input type="checkbox"/> Comprehensive Care                              |
| <input type="checkbox"/> Partnering with Consumers                     | <input type="checkbox"/> Communicating for Safety                        |
| <input type="checkbox"/> Preventing and Controlling Infections         | <input type="checkbox"/> Blood Management                                |
| <input type="checkbox"/> Medication Safety                             | <input type="checkbox"/> Recognising & Responding to Acute Deterioration |
| <input checked="" type="checkbox"/> NSQHS Standards are not applicable |  |

## Relevant Child Safe Standard

Standard 1

Standard 5

## Linked policies, Protocols or Procedures

[Child Safety Policy](#)

[Children in Need of Protection – Mandatory Reporting Protocol](#)

[Equal Opportunity Policy](#)

[Equal Opportunity Complaints Protocol](#)

[Fraud and Corruption Policy](#)

[Fraud and Corruption Protocol](#)

[Health Practitioner Mandatory Reporting Protocol](#)

## Departments

- Organisation wide

## Document Control

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