



<b>WHISTLEBLOWER POLICY</b>		Document #	Level: Tier 1
		Prepared By: GRC Manager	Date Prepared: 30 January 2018
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Compliance: Public Interest Disclosure Act 2013 (Cth) Public Interest Disclosures Act 2002 (Tas)			

### **Purpose**

The Archdiocese of Hobart ('Archdiocese') is committed to fostering a culture of honest and ethical behaviour.

The purpose of this policy is to encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to the Archdiocese without the fear of reprisal.

### **Scope of Application**

This policy applies to the Archdiocese and its agencies including: Archbishop's Office, Parishes, Church Office, CatholicCare Tasmania, Centacare Evolve Housing, Catholic Education Tasmania and the Catholic Development Fund.

This policy may also be used to apply to bodies or committees associated with any of the above agencies, established to progress initiatives under the auspices of the Archdiocese.

### **Policy**

All persons are encouraged, and have a responsibility, to report any known or suspected reportable conduct. No person will be personally disadvantaged for reporting.

When a person makes a disclosure:

- Their identity must remain confidential at all times to the extent permitted
- They will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure
- An independent inquiry or investigation will be conducted, as required
- Issues identified from the inquiry/investigation will be resolved and/or rectified
- They will be informed about the outcome.

The Archdiocese has engaged an independent, external party to facilitate Whistleblowing.

### **Information for Whistleblowers**

It is expected that people will attempt to resolve complaints and concerns through internal processes in the first instance, for example through internal grievance procedures or client feedback processes. Should a person feel a matter is not resolved through these process, or fear victimisation or retribution, they can report serious misconduct through the appointed external agency.

Protection is available to whistleblowers who disclose reportable conduct that is:

- Serious in nature
- Made in good faith
- Made with reasonable grounds to believe it is true.

Protection is not available where the disclosure is:

- Trivial or vexatious in nature with no substance. The latter will be treated in the same manner as a false report and may itself constitute reportable conduct and may result in disciplinary action
- Any unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. Will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

A Whistleblower must provide information to assist any inquiry/investigation of the reportable conduct.

Making a disclosure may not protect the Whistleblower from the consequences flowing from involvement. A person's liability for their own conduct is not affected by their report of that conduct under this policy. However, active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary or other action.

Even though a Whistleblower may be implicated in the reportable conduct they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

The Archdiocese will ensure disclosures are independently investigated and where necessary will appoint an external investigator. Outcomes and recommended actions will be reported to the relevant manager and person making the disclosure or allegation. In cases where the investigation has not substantiated the allegations, an appropriate explanation will be made to the person reporting. Information given to the person making the disclosure will be subject to privacy and confidentiality.

The most senior manager for each agency will be informed of all reports, investigation findings and actions taken.

All participants who are involved or become aware of serious misconduct allegations and a subsequent investigation must keep all details and results confidential.

This policy does not prevent a staff member from reporting to a regulator under an applicable law or standard.

## Definitions

**Whistleblower:** the disclosure by or for a witness, of reportable conduct. May be internal (for example employees and volunteers) or external (for example clients and suppliers) to the organisation.

**Reportable conduct:** is actual or planned conduct which the Whistleblower reasonably and in good faith suspects is:

- Dishonest
- Fraudulent
- Corrupt
- Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property)
- In breach of commonwealth or state legislation or local authority by-laws
- Unethical
- Serious improper conduct
- Unsafe work-practice
- Gross mismanagement
- Serious or substantial waste

- Repeated instances of breach of administrative procedures.

### **Related Documents**

Financial Management Policy  
Privacy Policy  
Risk Management Policy  
Workplace Behaviour Policy

### **Changes to this policy**

The Archdiocese will review this policy from time to time and updates are available on the website.

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### **Policy approved by:**

Most Rev Julian Porteous, Archbishop of Hobart,  
11 August 2018