



Catholic Diocese of Wagga Wagga

SPEAKOUT POLICY

"Speak out, pronounce a righteous verdict..."

Prov. 31:9 (RNJB)

1. Introduction

The Diocese of Wagga Wagga (Diocese) carries out pastoral work directly through its parishes, as well as through its Agencies including the Catholic Education Diocese of Wagga Wagga (CEDWW) and its Schools, Centacare South West NSW Ltd (Centacare), Vianney College and St Francis College, Wagga Wagga.

The Diocese is committed to adhering to its values, rules, and statutory obligations. We are committed to best practice in the corporate governance, compliance and ethical behaviour generally across all of the Diocesan Agencies. The Diocese is committed to providing those involved with our Organisation a safe environment to report serious concerns about the operations of the Diocese or related Agencies, including its branches, officers, employees or members, through appropriate and confidential channels without the risk of retaliation, victimisation or harassment in any form.

This Policy complies with relevant whistleblower legislation, including the *Corporations Act 2001* (Cth), and outlines the circumstances in which a report or disclosure will amount to a whistleblowing disclosure, and the various protections that are available to the relevant person in making the whistleblowing disclosure.

2. Purpose

The purpose of this Policy is to:

- a) Reflect the Catholic values at the heart of the Diocese's ministry, including the inherent respect for all people and the responsibility to ensure that all people are safe and supported.
- b) Outline what elements are required for a matter to be considered a Qualifying Disclosure under this Policy.
- c) Outline the protections which are available when a Qualifying Disclosure has been made.

- d) Demonstrate the Diocese's commitment to a safe and supportive environment where people feel confident to raise matters of concern regarding the conduct of the Diocese or its Agencies.
- e) Further develop the Diocesan culture which encourages people to speak up against injustice, and to hold the Diocese and its Agencies accountable.

3. Definitions

TERM	DEFINITION
Agency/Agencies	A Diocese-owned and/or governed entity. Including but not limited to: <ul style="list-style-type: none"> • Catholic Education Diocese of Wagga Wagga – including the central office and all schools • Centacare South West NSW Ltd • Vianney College • St Francis College (CSU)
Bishop	The Ordinary (Leader) of the Diocese of Wagga Wagga.
Clergy	Any ordained member ministering in the Diocese of Wagga Wagga. For the purpose of this Policy, references to Clergy include Deacons and Seminarians.
Diocese	The Diocese of Wagga Wagga. The Diocese refers to the entirety of the Diocese including the parishes and other ministries, as well as the general office of the Diocese.
Disclosable Conduct	Disclosable Conduct has the definition afforded at section 1317AAD of the <i>Corporations Act 2001</i> (Cth) and outlined in section 10 of this Policy.
Eligible Recipient	An Eligible Recipient has the definition afforded at section 1317AAC of the <i>Corporations Act 2001</i> (Cth) and outlined in section 9 of this Policy.
Eligible Whistleblower	An Eligible Whistleblower has the definition afforded at section 1317AAA of the <i>Corporations Act 2001</i> (Cth) and outlined in section 7 of this Policy.
Qualifying Disclosure	A Qualifying Disclosure has the definition outlined in section 5 of this Policy.
Trustees	As defined in the <i>Roman Catholic Church Trust Property Act 1936</i> (NSW), the Trustees include the Bishop and the Diocesan Consultors.

4. Scope

- a) This Policy is the overarching whistleblowing policy for the Diocese and its Agencies. This Policy is designed to operate alongside the operating whistleblower frameworks of the Diocesan Agencies.
- b) Where appropriate, the Diocese encourages Qualifying Disclosures to be made under the CEDWW *Whistleblower Policy*, and the Centacare *Whistle-blower Protection Policy*.

- c) If a Qualifying Disclosure made under this Policy falls within the scope of CEDWW or Centacare policies, the Diocese may refer it to the relevant Agency. However, the Diocese retains discretion to manage the Disclosure under this Policy when referral would be inappropriate, such as when allegations involve senior staff of the Agency in question.
- d) To determine whether your concerns should be managed in accordance with this Policy, or alternatively referred back to CEDWW or Centacare, please see **Annexure A**.

5. Qualifying Disclosures

- a) A report will amount to a Qualifying Disclosure when all the following criteria are met:
 - (i) the report is made by an Eligible Whistleblower (as defined at section 7); and
 - (ii) the report was made to an Eligible Recipient (as defined at section 9); and
 - (iii) the report was made about Disclosable Conduct (as defined at section 10); and
 - (iv) the Eligible Whistleblower has reasonable grounds to suspect that Disclosable Conduct has occurred;
- b) A Qualifying Disclosure will qualify for the protections outlined under law and this Policy.
- c) If a report does not meet each of the above criteria it is not a Qualifying Disclosure, and accordingly the protections outlined under law and this Policy will not apply.
- d) To determine whether your concern amounts to a Qualifying Disclosure under this Policy, please see **Annexure B**.

6. How to make a Qualifying Disclosure

- a) A Qualifying Disclosure can be reported in any format, including verbally or in writing – so long as it is made to an Eligible Recipient.
- b) The report should set out the grounds for the concern that Disclosable Conduct has occurred, including all relevant facts and details. Any documentation which supports the concerns should also be provided.
- c) A Qualifying Disclosure does not need to identify particular breaches (for example, of the law), however, the report should contain as much detail as possible to demonstrate the Disclosable Conduct, and the reasons or grounds for the suspicion. The ability to properly assess, investigate and/or respond to a report of Disclosable Conduct will be impeded if sufficient detail or information is not provided.
- d) If you are unsure whether a report will amount to a Qualifying Disclosure, you may consult an Eligible Recipient to seek their assistance, support or advice on a confidential basis. However, there is no requirement to do so before making a report, or to access the protections available under this Policy.

7. Eligible Whistleblower

- a) An Eligible Whistleblower is a person as defined under section 1317AAA of the *Corporations Act 2001* (Cth). In summary, an Eligible Whistleblower is a:
 - current or former officer employee of the Diocese and/or its Agencies; or
 - current or former person (or employee of a person/entity) who has supplied goods or services to the Diocese and/or its Agencies; or

- current or former associate of the Diocese and/or its Agencies; or
 - a relative, spouse or dependant of any person as outlined above, or a dependent of such a person's spouse.
- b) An Eligible Whistleblower may report a matter anonymously, and without identifying themselves or their role.
 - c) Whilst this Policy does not form part of any person's contract of employment or a contract for services, the Diocese requires all persons and Eligible Whistleblowers to comply with the Policy.
 - d) If a person purports to make a Qualifying Disclosure under this or other whistleblowing policies but does not satisfy the definition of an Eligible Whistleblower, their report will not be dealt with under this or other whistleblowing frameworks. If deemed appropriate, their report may be dealt with under other Diocese policies and procedures including, but not limited to, the Complaints Handling Policy.

8. Anonymous reports

- a) An Eligible Whistleblower can choose to remain anonymous throughout the relevant process, including at the time of making a report, as well as during and after an investigation.
- b) Whilst an Eligible Whistleblower can choose to remain anonymous, they are still required to be a person outlined in the definition of an Eligible Whistleblower.
- c) Whilst information in an anonymous report will be considered at face value, it may be difficult to respond to and/or investigate the concerns appropriately. Maintaining the anonymity of a report could impact on the ability for adequate investigation to be conducted, for the Eligible Whistleblower to be kept informed of the process and outcomes, or to ensure that the Eligible Whistleblower receives the relevant protections afforded under legislation and this Policy.
- d) The Diocese encourages an Eligible Whistleblower to provide their name and appropriate contact details. If the Eligible Whistleblower does not want to provide identifying information, they are encouraged to provide an anonymous point of contact (for example, by creating an email account which is not seen to relate to them) so that there is an avenue to seek further information from the Eligible Whistleblower or to provide them with information and updates about the matter, where appropriate.
- e) An Eligible Whistleblower may elect to provide their identity to the Eligible Recipient, and to retain their anonymity in respect of the Diocese.
- f) However, if the Eligible Whistleblower elects to remain entirely anonymous, the Diocese will respect the person's wishes and take all reasonable steps to preserve their anonymity and to investigate the concerns raised to the extent reasonably possible with the information given.

9. Eligible Recipient

- a) An Eligible Recipient is a person as defined under section 1317AAC of the *Corporations Act 2001* (Cth). In summary, an Eligible Recipient is:
 - The Chief Operating Officer;

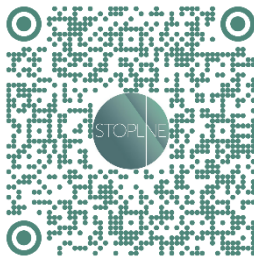
Phone: 0269 37 0003

Email: coo@wagga.catholic.org.au

Address: PO Box 473, Wagga Wagga NSW 2650

- The Diocesan Safeguarding Manager;
Phone: (02) 6937 0003
Email: safeguarding@wagga.catholic.org.au
Address: PO Box 473, Wagga Wagga NSW 2650
- The external Whistleblower Service (the “WBS”) currently Stopline Pty Ltd
Phone: 1300 30 45 50
Mail: Diocese of Wagga Wagga
c/o Stopline PO Box 403 Diamond Creek, VIC 3089
Email: makeareport@stopline.com.au;
Online: <https://makeareport.stopline.com.au/portal/landing/diocesewaggawagga>

And linked on the Diocesan website under ‘Whistleblower Disclosure Form’.



- an officer or senior manager of the Diocese; or
 - an auditor of the Diocese; or
 - an actuary of the Diocese, or
 - the Australian Securities & Investments Commission (ASIC); or
 - the Australian Prudential Regulation Authority (APRA); or
 - a lawyer in order to obtain legal advice or representation.
- b) If the circumstances described in section 1317AAD of the *Corporations Act 2001* (Cth) exist, then an Eligible Whistleblower may make a public interest or emergency disclosure to the following persons:
- a member of Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory; or
 - a journalist.
- c) The WBS is an independent legal and multidisciplinary practice, Stopline Pty Ltd. Arrangements have been made by the Diocese for the WBS to conduct the initial assessment, investigation, and management of all Qualifying Disclosures for the Diocese. The WBS reports to Bishop, either directly or through the Diocesan Safeguarding Manager. If a Qualifying Disclosure relates to the Diocesan Safeguarding Manager, then the WBS will engage with the Chief Operational Officer and/or the Bishop.

- d) The WBS responds to and manages all Qualifying Disclosures and maintains the collection of data for all Qualifying Disclosures made to the WBS and the outcome for the Diocese.

10. Disclosable Conduct

- a) Disclosable Conduct is any disclosable matter as defined at section 1317AAD of the *Corporations Act 2001* (Cth). In summary, this includes concerns that the Diocese or its Agencies, or an officer or employee of the Diocese or its Agencies, have engaged in the following:
 - (i) misconduct,
 - (ii) an improper state of affairs or circumstances.
 - (iii) illegal activity – meaning an offence or contravention of the *Corporations Act 2001* (Cth) or specified financial services legislation, or an offence against any law of the Commonwealth punishable by imprisonment of 12 months or more; or
 - (iv) conduct that represents a danger to the public or the financial system.
- b) Disclosable Conduct may include, but is not limited to:
 - (i) breaches of the law or regulations;
 - (ii) fraud, negligence, default, breach of trust and breach of duty;
 - (iii) theft, dishonesty, corruption, bribery or money laundering or other criminal conduct;
 - (iv) breach of duty;
 - (v) misleading or deceptive conduct, including improper or misleading accounting or financial reporting practices;
 - (vi) systemic practices that create a significant risk to public safety or the environment; and
 - (vii) attempted or actual victimisation of an Eligible Whistleblower.
- c) For an Eligible Whistleblower to qualify for the protections under legislation and this Policy, the Eligible Whistleblower must have reasonable grounds to suspect that Disclosable Conduct has occurred.
- d) Reasonable grounds means that a reasonable person in their position would also suspect the information indicates the relevant Disclosable Conduct has occurred.
- e) In circumstances where there were no reasonable grounds for a report to be made, consideration will be given to whether the person knowingly made a vexatious, false, or misleading report.
- f) Where there are no reasonable grounds for a report to be made, the report will not constitute a Qualifying Disclosure. Accordingly, concerns that a report was vexatious, false, or misleading will be managed by the Diocese in accordance with its other policies and procedures, including the Code of Conduct and Ethics, and the Complaints Handling Policy. Should a subsequent process find that a vexatious, false or misleading report was made, the Eligible Whistleblower may be subject to disciplinary or other legal action as required.

- g) A finding that the Qualifying Disclosure was incorrect, unsubstantiated, or based on an inaccurate factual understanding does, in and of itself, mean that the report was vexatious, false or misleading. Due care must be taken to ensure that any such concerns subject of due process and fair treatment.
- h) The Diocese encourages all matters of Disclosable Conduct to be reported in accordance with this Policy.

11. Concerns which do not constitute Disclosable Conduct

- a) Generally, personal work-related grievances will not constitute Disclosable Conduct under this Policy.
- b) A 'personal work-related grievance' is a grievance which relates to the person's employment or former employment with the Diocese or its Agencies, and has or tends to have personal implications for the person but no significant implications for the Diocese or its Agencies unrelated to the person.
- c) Examples of personal work-related grievances may include:
 - an interpersonal conflict between the person and another staff member;
 - any decision relating to the person's employment or other contractual engagement, transfer or promotion;
 - any decision relating to the terms and conditions of employment or other contractual engagement of the person;
 - any decision to suspend or terminate the person's employment or other contractual engagement, or to otherwise discipline the person.
- d) Personal work-related grievances which do not constitute Disclosable Conduct may be managed in accordance with more appropriate policies, such as the relevant Code of Conduct or Grievance Policy.
- e) However, some personal work-related grievances (such as victimisation for making a Qualifying Disclosure) will amount to Disclosable Conduct, and accordingly the protections set out in this Policy and the *Corporations Act 2001* (Cth) would apply.

12. Alternative Resolution of Concerns

- a) Whilst Disclosable Conduct may be reported in accordance with this Policy, the eligible Whistleblower can elect to make an informal complaint or report in accordance with other policies and procedures such as the Diocesan Complaints Handling Policy.

13. Management of and response to a Qualifying Disclosure

- a) Where Disclosable Conduct can involve a broad range of conduct, every Qualifying Disclosure will involve different issues, circumstances and risks. Accordingly, the appropriate management of, and response to, Qualifying Disclosures will differ on account of the varied details.
- b) Generally, the process adopted will involve:
 - An initial assessment of the Qualifying Disclosure;
 - An investigation of the Disclosable Conduct; and
 - The provision of findings and outcomes to the Diocese.

- c) Whilst best efforts will be made to follow these processes, as outlined below, aspects of the process may change from time to time to allow for the appropriate response to the report, and any risks arising.
- d) The process for management of a Qualifying Disclosure is outlined at **Annexure C**.

14. Initial Assessment of a Qualifying Disclosure

- a) Following the report of a potential Qualifying Disclosure, the Eligible Recipient will acknowledge receipt of the report, assuming the Eligible Whistleblower can be contacted (including through anonymous channels).
- b) The Eligible Recipient will take detailed notes of the report. Where there is a verbal report, the Eligible Recipient must take care to ensure that they record all relevant information.
- c) As soon as practicable, and ideally within 24 hours, the Eligible Recipient will refer to the Qualifying Disclosure and all relevant information and documents to the WBS.
- d) As soon as practicable, and ideally within 24 hours, the WBS will assess the report to determine whether the report is a Qualifying Disclosure, and if so, whether the Qualifying Disclosure should be managed under this Policy, or referred to Centacare or CEDWW for their consideration. In the course of this assessment, the WBS will also consider any legal obligations for the Diocese to report the alleged issues to an external authority.
- e) If the report does not constitute a Qualifying Disclosure, the WBS:
 - will inform the Eligible Whistleblower of this assessment, assuming they can be contacted.
 - if another policy is applicable, the WBS will refer the Eligible Whistleblower to the appropriate policy.
 - will also inform the Bishop (either directly or via the Diocesan Safeguarding Manager or the Chief Operational Officer) that a report was received but was not assessed to be a Qualifying Disclosure.
- f) If the report is assessed to be a Qualifying Disclosure, the WBS will inform the Bishop (either directly or via the Diocesan Safeguarding Manager or the Chief Operational Officer) that a Qualifying Disclosure has been received and provide details as to how the WBS will manage and respond to the Qualifying Disclosure.
- g) As soon as practicable, and ideally within three business days, the WBS will complete a risk assessment and management plan which considers presenting risks for individuals (including the Eligible Whistleblower, the person/s subject of the report, and any other related parties) and the Diocese. The WBS will support the Diocese to action the risk management plan.
- h) The risk assessment and management plan will involve liaising with the Eligible Whistleblower, Bishop, Diocesan Safeguarding Manager and/or Chief Operational Officer, as appropriate, to ensure that relevant risks have been identified and will be adequately managed or mitigated.
- i) The risk assessment and management plan will be reviewed periodically by the WBS throughout the process and updated where necessary.

15. Investigation of a Qualifying Disclosure

- a) Generally, if an investigation is required, the WBS will determine:
 - the nature and scope of the investigation;
 - a suitable investigator;
 - the nature of any technical, financial or legal advice that may be required to support the investigation; and
 - the anticipated timeframe for the investigation.
- b) Each investigation will be different, which will impact on the applicable timeframe. However, the Diocese's intent is to complete an investigation as soon as practicable.
- c) All investigations will adhere to principles of procedural fairness, and relevant Diocesan policies and procedures. Generally, this will include that:
 - the person/s subject of allegations will be notified of the specific allegations and afforded the opportunity to provide a response which will be considered in making findings;
 - the person/s subject of allegations will be informed of professional and/or support services which are available to them.
- d) Where practicable, the Eligible Whistleblower and the person/s subject of allegations will receive updates on the progress of the investigation including when the investigation has been finalised. The frequency and timeframe of any updates may vary depending on the nature of the investigation. However, the extent of the information provided, or whether it will be provided at all, will be subject to applicable confidentiality considerations, legal obligations and any other factors the WBS or the Diocese considers relevant in the particular situation.
- e) At the conclusion of the investigation, the WBS will provide to the Bishop (either directly, or via the Diocesan Safeguarding Manager or the Chief Operational Officer) a report detailing the steps undertaken during the investigation, the allegations and relevant evidence, and the proposed findings of the investigation.

16. Findings and Outcomes

- a) Having reviewed the investigation report, the Bishop will determine the final findings and suitable outcomes, including whether any disciplinary or other legal action, up to and including dismissal, is warranted.
- b) Where possible and appropriate, the Eligible Whistleblower and persons who are the subject of the allegations will be informed of the findings, and any outcomes relevant to them.
- c) All documentation and records involving the matter are retained securely and confidentially by the Diocese in accordance with the Diocese's data management protocols.

17. Procedural fairness

- a) The Diocese and the WBS will take reasonable measures to ensure the fair treatment of employees who are mentioned in a Qualifying Disclosure.

Any process undertaken will be objective, fair, independent and progressed in a timely

manner (although the process and timing may vary depending on the nature of the Qualifying Disclosure). Care will be taken to ensure that any conflicts of interest are appropriately managed and/or avoided in accordance with Diocesan policy and procedure.

18. Protections for Eligible Whistleblowers

- a) An Eligible Whistleblower who makes a report in accordance with this Policy will have access to various protections, including protections under the *Corporations Act 2001* (Cth) as set out below. These protections apply to the reporting of a Qualifying Disclosure, as well as during the course of and after the investigation process.

18.1. Confidentiality

- a) Under the Corporations Act 2001 (Cth), the identity of an Eligible Whistleblower and any information which is likely to lead to the identification of the Eligible Whistleblower, must not be disclosed unless the Eligible Whistleblower has provided their consent, or the disclosure is specifically authorised by law.
- b) Such authorisation under law may include disclosure to ASIC, the Australian Federal Police, or a legal practitioner for the purpose of obtaining advice about the application of whistleblower protections.

The Diocese may be legally obligated to disclose certain information to external authorities, which may affect confidentiality protections. In such cases, the Diocese may be unable to maintain complete confidentiality regarding either the Qualifying Disclosure or the Eligible Whistleblower's identity. These mandatory reporting obligations may include, but are not limited to, reports to:

- NSW Police
- NSW Office of the Children's Guardian
- NSW Education Standards Authority
- NSW Department of Education

The Diocese will inform the Eligible Whistleblower whenever possible if such disclosure becomes necessary.

- c) The Diocese may need to disclose information which could lead to the identification of the Eligible Whistleblower if the disclosure is reasonably necessary for the purpose of investigating the matter. The Diocese will take all reasonable steps to reduce the risk that the Eligible Whistleblower will be identified as a result of the information being disclosed.
- d) Any unauthorised breach of the confidentiality protections regarding the identity of the Eligible Whistleblower is a criminal offence, and may be the subject of criminal, civil and disciplinary proceedings.
- e) The Diocese will maintain confidentiality in the handling and storage of records.
- f) The Diocese will protect the identity of an Eligible Whistleblower by appropriately redacting documents and referring to the Eligible Whistleblower in gender-neutral terms. It will also secure all documents and communicate them in a way that will maintain confidentiality.

18.2. No detriment for whistleblowing

- a) Eligible Whistleblowers are protected from victimisation and suffering any detriment for having made a Qualifying Disclosure.
- b) It is unlawful for a person to engage in conduct against another person that causes, or will cause detriment, where the person believes or suspects that the other person or a third person made, may have made, proposes to make or could make a Qualifying Disclosure. Threats of detriment are also unlawful.

A 'detriment' includes any form of unfavourable treatment such as:

- Victimisation (of the person or any of their dependents)
 - Harassment or intimidation
 - Employment-related disadvantages, including: • Injury to employment • Unfavourable alteration of position or duties • Dismissal or termination
 - Discrimination
 - Actual physical or psychological harm or injury
 - Damage to the person's property, reputation or financial position
- c) If an Eligible Whistleblower or witness is concerned that they have been subject to a detriment or threat of detriment, this should immediately be reported to an Eligible Recipient.
 - d) The Diocese may also consider a range of other matters to protect an Eligible Whistleblower from the risk of suffering detriment and to ensure fair treatment of individuals mentioned in a Qualifying Disclosure. Steps it will take to help achieve this may include:
 - Assessing whether anyone may have a motive to cause detriment. Information could be gathered from an Eligible Whistleblower about:
 - the risk of their identity becoming known;
 - who they fear might cause detriment to them;
 - whether there are any existing conflicts or problems in the workplace; and
 - whether there have already been threats to cause detriment.
 - Analysing and evaluating the likelihood of each risk and evaluating the severity of the consequences;
 - Developing and implementing strategies to prevent or contain the risks for anonymous Qualifying Disclosures, and assessing whether the Eligible Whistleblower's identity can be readily identified or may become apparent during an investigation;
 - Monitoring and reassessing the risk of detriment where required—the risk of detriment may increase or change as an investigation progresses, and even after an investigation is finalised;
 - Taking steps to ensure that:
 - Qualifying Disclosures will be handled confidentially when it is practical and appropriate in the circumstances;

- each Qualifying Disclosure will be assessed and may be the subject of an investigation;
 - the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters disclosed.
- e) The Diocese and individuals may face significant civil and criminal penalties for failing to comply with confidentiality and detrimental conduct provisions.
 - f) It is a breach of this Policy to subject an Eligible Whistleblower or witness to a detriment for reporting misconduct or assisting an investigation of a report, other than as set out above. Such conduct by an employee or officer of the Diocese or its Agencies is grounds for disciplinary or other action, which may include termination of the person's employment or other contractual engagement.
 - g) An Eligible Whistleblower may seek compensation or other legal remedies in relevant proceedings if they experience a detriment for making a Qualifying Disclosure.

18.3. Review of decisions

- a) Any Eligible Whistleblower who believes that their Qualifying Disclosure has not been properly addressed in accordance with this Policy should notify the Eligible Recipient who received their original report, and request that the matter be reviewed by the Bishop. This includes any decision not to investigate a report, or the outcomes of any investigation.

18.4. Immunity

- a) An Eligible Whistleblower will not be subject to any civil, criminal or administrative liability (including disciplinary action) for making a Qualifying Disclosure. No contractual or other remedy may be enforced against an Eligible Whistleblower for making a Qualifying Disclosure under this Policy or applicable legislation.
- b) Certain protections may apply for certain types of Qualifying Disclosures (generally made external to the Diocese), including immunities to ensure that information they disclose is not admissible in evidence against them in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information. These immunities do not prevent an Eligible Whistleblower being subject to criminal, civil or other liability for conduct that is revealed by the Eligible Whistleblower, only that the information they have disclosed is not admissible in certain proceedings against them.
- c) There are additional protections and remedies available for certain disclosures made under particular legislation, including the *Corporations Act 2001* (Cth) and the *Tax Administration Act 1953* (Cth).

18.5. Access to support

- a) The Diocese is committed to providing appropriate support to Eligible Whistleblowers, the subject(s) of any Qualifying Disclosure, and other persons who may engage in any investigation process. The nature of the support offered will depend on the circumstances but may include monitoring of risks presenting for the individual, or providing strategies to manage stress.
- b) If the Eligible Whistleblower, the person/s subject of allegations, or a participant in an investigation process is a current Diocesan staff member, they may use the Employee

Assistance Program. Any queries regarding support should be made to an Eligible Recipient.

19. Staff awareness and training

- a) The Diocese and its Agencies will make this Policy available to all staff members (including employees, volunteers and contractors), who must familiarise themselves with this Policy.
- b) The Diocese will ensure that Eligible Recipients and senior leadership within the Diocese, including clergy, are provided with appropriate training regarding this Policy and management of such matters.

20. Consequences of breaching this policy

- a) Any staff member who becomes aware of a breach of this Policy is encouraged to promptly report the breach to the Diocesan Safeguarding Manager, or the Chief Operational Officer.
- b) Any alleged breaches of this Policy will be taken seriously and may lead to disciplinary action, up to and including termination of persons' employment or other contractual engagement.

21. Monitoring and Review

- a) This Policy will be subject of review on an ongoing and periodic basis, or as required following legislative updates or other feedback.

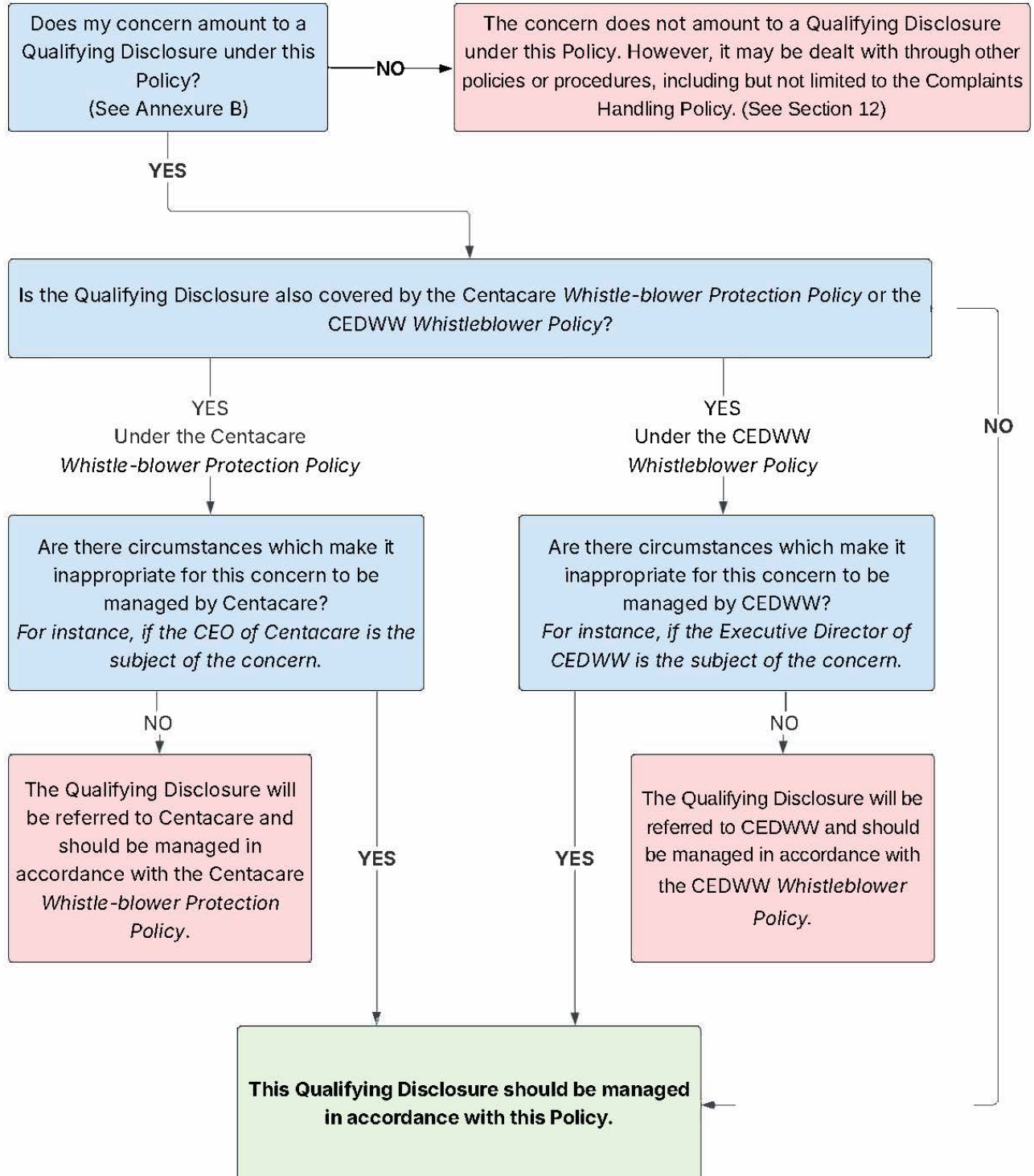
22. Version Control and Change History

Version	Approved Date	Approved By	Description	Review Completed By	Consultation Process
1.0	22/07/2025	Bishop Mark Edwards OMI	New document	Bishop Mark Edwards OMI	Bishop Mark Edwards OMI, Bernie Sandral Chief Operating Officer and the Diocesan Office of Safeguarding

Annexure A: Relationship between this Policy and other whistleblower policies

Relationship between this Policy and other whistleblower policies

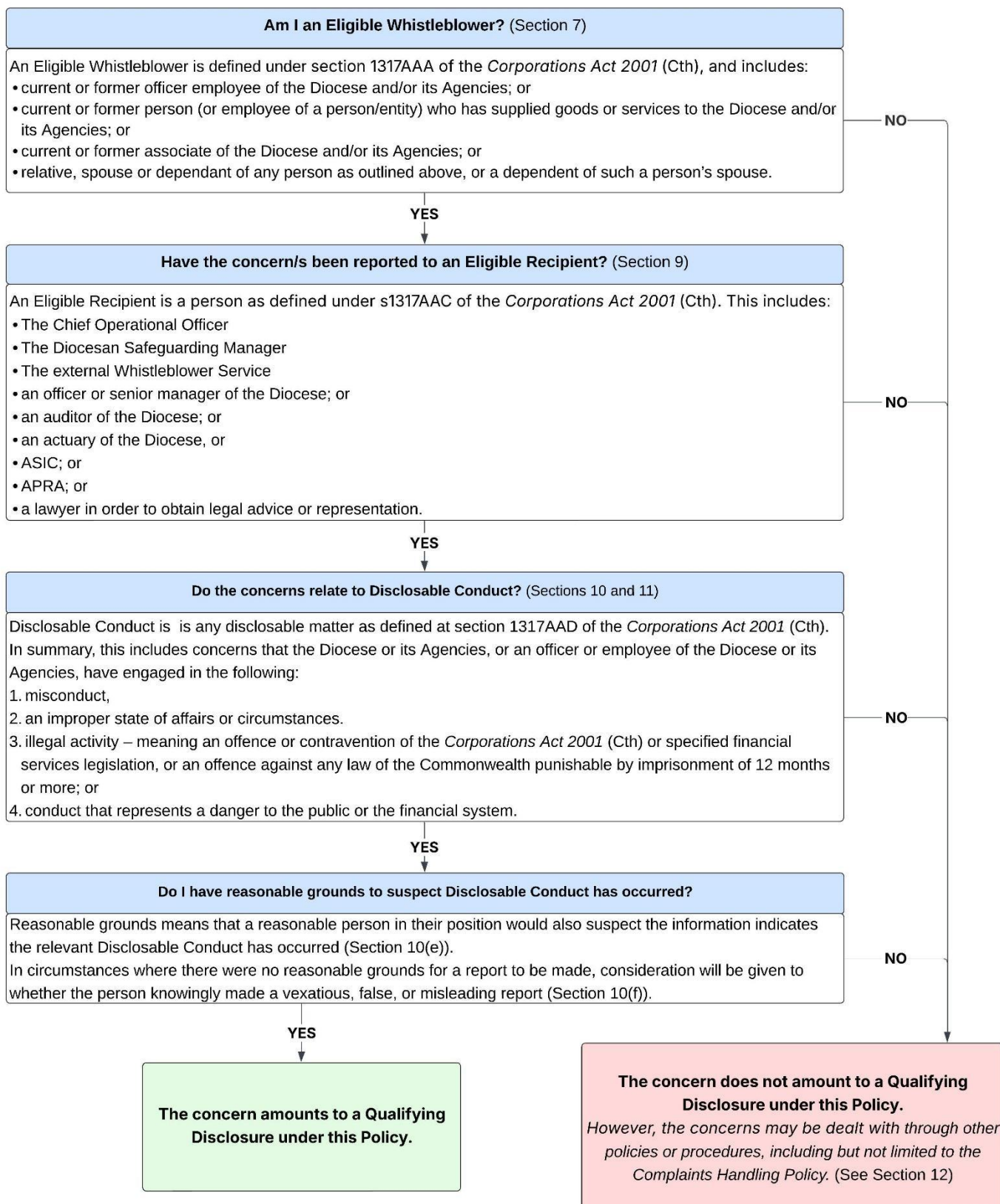
This flowchart should be used to determine whether a Qualifying Disclosure under this Policy should be managed under this Policy, or referred for management under the whistleblower policy of CEDWW or Centacare.



Annexure B: Does my concern amount to a Qualifying Disclosure

Does my concern amount to a Qualifying Disclosure?

This flowchart should be used to confirm whether any concern/s you hold amount to a Qualifying Disclosure under the DWW Speakout Policy.



Annexure C: Process for managing a Qualifying Disclosure

Process for managing a Qualifying Disclosure

Where a report is made under this Policy, this flowchart can be used to understand the process which occurs following the report.

