



St Ursula's College

TOOWOOMBA

Whistleblower Policy

CRICOS No. 03033M

Updated
Feb 2022



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POLICY

Approval Date	Feb 2022
Review Date	Feb 2022
Next Review Date	Feb 2023
Author	Principal
Approved By	College Board

WHISTLEBLOWER POLICY

Introduction

St Ursula's College is committed to ethical behaviour that is aligned with our values and complies with all relevant laws.

A whistleblower is a person who makes a disclosure, outside normal business channels, whether anonymously or not, with respect to serious conduct such as corruption, fraud or some other illegal or undesirable activity.

We recognise that people who have a work, service or customer relationship with the St Ursula's College are often best placed to identify illegal or other undesirable conduct, however may not speak up, either because there is not a clear mechanism for them to do so, or as a result of fear of being victimised if they report the matter

We are committed to providing a supportive environment for any person making a whistleblower disclosure and we will use our best endeavors to ensure that no individual making a whistleblower disclosure, is personally disadvantaged by having made a disclosure in good faith. This includes protection from dismissal or demotion, any form of reprisal including retaliation, harassment or victimisation.

St Ursula's College has documented and implemented a detailed Whistleblower Program, that is available to the College Board and all staff (teaching and non-teaching) through the College website and Complispace. Our Whistleblower Program sets out key roles and responsibilities and outlines processes with respect to ensuring transparency and accessibility for all key stakeholders including College Board members, staff, parents, carers, volunteers, contractors, students and suppliers. It also sets out internal management reporting requirements and responsibilities with respect to the ongoing maintenance and review of the Whistleblower Program and this Whistleblower Policy.

All College Board members and St Ursula's College staff members are required to undertake an internal training course with respect to the objectives and practical application of our Whistleblower Program.

Objectives

The objectives of this Policy are to:

- encourage the reporting of actual or suspected wrongdoing that can not appropriately be reported through normal business channels
- describe clearly the process for making a whistleblower disclosure and the types of matters that should be reported



- describe clearly the process for investigating a whistleblower disclosure
- outline how St Ursula's College manages whistleblower disclosures in a way that will support and protect the whistleblower, as well as ensure fairness for a person named in the disclosure.
- give effect to the spirit of whistleblower legislation that prohibits regulated organisations from taking adverse action against any staff member, or a supplier of services or goods.

Scope

Our Whistleblower Program, including this Policy, has been designed to be available to all current or former:

- directors and officers of St Ursula's College
- permanent, part-time and casual staff (teaching and non-teaching)
- volunteers
- contractors
- suppliers
- parents and carers
- students
- other key stakeholders.

Types of Conduct to be Reported

Our Whistleblower Program is designed to capture actual or suspected wrongdoing, that a person providing the disclosure considers, can not reasonably be managed through our existing internal reporting procedures. Examples of wrongdoing that may be reportable include:

- fraud, forgery, misappropriation, misuse, misdirection, misapplication, maladministration, or waste of funds
- gross mismanagement
- grooming and/or child abuse
- conflicts of interest, nepotism, favouritism
- theft, embezzlement, tax evasion
- corruption, dishonesty involving influence
- coercion, harassment or discrimination by, or affecting, any of our staff, volunteers or contractors
- assault, blackmail, taking or offering bribes
- abuse of public trust
- misleading or deceptive conduct of any kind, including conduct or representations that amount to improper or misleading accounting or financial reporting practices by or affecting St Ursula's College
- other criminally prosecutable offences
- failure to report, or concealment of, an indictable offence
- unreasonable danger to health or safety of others
- failure to act in accordance with applicable professional and ethical standards
- blatant disregard for organisational policies



- a significant threat to the environment
- significant breach of the terms of any contract that binds St Ursula's College
- other serious acts such as refusing to carry out lawful and/or reasonable actions under a contract
- other serious misconduct that may materially damage St Ursula's College's reputation, or may otherwise be detrimental to the College
- any other act that would otherwise be considered, by a reasonable person, to be serious improper conduct, or an improper state of affairs, or circumstances.

Wrongdoing would also include a deliberate attempt to conceal any of the actions described above.

A person making a whistleblower disclosure is expected to act in good faith and have reasonable grounds for believing that wrongdoing has occurred.

A whistleblower should not use the whistleblower service to report a personal work-related grievance, a third party complaint or a child protection incident that could be effectively managed through our existing internal reporting procedures.

If a whistleblower disclosure is made through the whistleblower service that does not meet the threshold of reportable wrongdoing such as that listed above it may be referred by Stopline Pty Ltd to the appropriate department or staff member to manage (for example our College Principal or Deputy Principal) and will be recorded as not being a disclosable matter. Protection of anonymity does not apply in the same strictness to disclosures that are not disclosable matters, however confidentiality will be maintained as appropriate.

Whistleblower Support and Protection

St Ursula's College is committed to providing a supportive environment for any person making a whistleblower disclosure and we will use our best endeavours to ensure that no individual making a whistleblower disclosure, is personally disadvantaged by having made a disclosure in good faith. This includes protection from dismissal or demotion, any form of reprisal including retaliation, harassment or victimisation.

Further details of support and protections provided are set out below.

Anonymity and Confidentiality

St Ursula's College will, as far as reasonably possible, provide to whistleblowers the ability to make a report anonymously and will take all reasonable steps to reduce the risk that the discloser will be identified as a result of the investigation.

St Ursula's College engages Stopline Pty Ltd as our External Whistleblower Service. One of the primary purposes of retaining Stopline Pty Ltd is to allow whistleblowers to disclose their identity to Stopline Pty Ltd only and to keep their identity confidential from St Ursula's College.

If a whistleblower provides their identity to Stopline Pty Ltd it can assist in any subsequent investigation, and also will allow Stopline Pty Ltd to follow up to seek any clarification or provide feedback.

If the whistleblower's identity is disclosed to Stopline Pty Ltd, they will at the first opportunity discuss with the whistleblower the issues of anonymity and confidentiality and the degree of risk that their identity may become known during an investigation.



Information received from a whistleblower will be held in the strictest confidence and will only be disclosed to a person not connected with the investigation if:

- the whistleblower has been consulted and consents in writing to the disclosure; or
- Stopline Pty Ltd is compelled by law to do so.

Stopline Pty Ltd will advise the whistleblower if matters change in a way that affects their ability to protect the whistleblower's identity and will give the whistleblower as much warning as reasonably possible if it appears likely that their identity will become known.

Supportive Environment

We are committed to providing a supportive environment for any person making a whistleblower disclosure. In particular, a whistleblower can expect that:

- any request for anonymity is respected and if their identity is revealed it will, as far as possible, remain confidential and only be disclosed on an "as needed basis"
- the details of their disclosure will remain confidential to the extent that is practical in the circumstances and will only be released on an "as needed basis" during the investigation phase, or as required by law
- they will be protected from retaliation, harassment or victimisation
- should retaliation occur, it will be treated as serious misconduct and the perpetrator of the retaliation will be subject to disciplinary action.

Where you have provided your identity to Stopline Pty Ltd, but not to St Ursula's College, it is the role of Stopline Pty Ltd to ensure you are supported throughout the investigation process.

Where you have provided your identity directly to St Ursula's College, it is the role of the Principal or Deputy Principal who received your disclosure to ensure you are supported throughout the investigation process.

Stopline Pty Ltd will also advise you of professional support services, such as confidential professional counselling services, that may be available to you. The College provides confidential counselling via Catholic Care EAP – phone 1300 477 433.

Protection from Retaliation, Harassment or Victimisation

Our commitment to ensuring the highest standards of ethical conduct within St Ursula's College includes creating and maintaining a "speak-up culture", where all staff members are encouraged to identify issues in the workplace and participate in resolving them. This includes "speaking up" through our existing internal reporting procedures including our Internal Grievance Policy, Complaints Handling Program, and Child Protection Program.

We do not tolerate reprisals or adverse action being taken against whistleblowers for reporting actual or suspected wrongdoing, including when suspicions are not substantiated following a thorough investigation.

We take steps to promote awareness to all staff of their responsibilities to treat their colleagues and stakeholders with respect, and never to engage in behaviour that is discriminatory or that characterises bullying or harassment. These responsibilities encompass acknowledging that reporting actual or



suspected wrongdoing is integral to an ethical culture, and nobody who reports actual or suspected wrongdoing should experience detriment as a result.

If a whistleblower provides their identity when they make a whistleblower disclosure the Stopline Pty Ltd representative, assigned to the case, will proactively monitor the workplace for signs of retaliation, harassment or victimisation and intervene when necessary.

A whistleblower who experiences retaliation, harassment or victimisation should immediately report it to their Stopline Pty Ltd representative. Any such conduct will be treated as serious misconduct and the perpetrator of the retaliation will be subject to disciplinary action.

Immunity from Internal Disciplinary Action

To promote a culture that encourages whistleblower disclosures it is our policy that where a whistleblower has acted in good faith, and the individual involved has not engaged in serious misconduct or illegal activity, the whistleblower will be provided with immunity from internal disciplinary proceedings that may have otherwise arisen from the matters that are the subject of the whistleblower disclosure.

Investigating a Whistleblower Disclosure

All reports, other than those that are not disclosable matters, will be investigated by a Stopline Pty Ltd Investigator.

Stopline Pty Ltd Investigators are appointed by Stopline Pty Ltd on a case-by-case basis depending on the particular circumstances of the whistleblower disclosure and must be independent of the whistleblower, or any person being the subject of the reported conduct.

Stopline Pty Ltd Investigators will have reasonable access to independent specialist advice if required and will as far as reasonably possible, follow best practice in investigations including ensuring that all reports of actual or suspected wrongdoing will be investigated in a way that adheres to the principles of objectivity, procedural fairness, confidentiality and natural justice. This includes providing fair treatment to people who have been mentioned in a report of actual or suspected wrongdoing, by informing of the substance of statements that have been made about them and giving them a reasonable opportunity to respond.

Provision of Feedback

If the whistleblower's identity is known to the Stopline Pty Ltd Investigator then, where possible, then Stopline Pty Ltd will provide feedback to the whistleblower during the course of the investigation and will ensure that the whistleblower will be informed of the outcome of an investigation and in particular:

- if the whistleblower's concern was substantiated, the action that has been taken or will be taken to address the issues;
- if the whistleblower's concern was not substantiated, then that no further action will be taken unless further information becomes available.



How to Make a Whistleblower Disclosure

To provide effective protection of whistleblowers, including allowing continuous discussion with anonymous whistleblowers, St Ursula's College has chosen to use the external, secure, online service, Stoline Pty Ltd.

Stoline Pty Ltd is an independent service provider with staff who are specifically trained to deal with the types of sensitive issues that are reported through whistleblower systems.

A whistleblower disclosure to Stoline Pty Ltd may be provided on an anonymous basis or on the basis that the whistleblower's identity is disclosed to Stoline Pty Ltd only and kept confidential from St Ursula's College. The provision of your identity to Stoline Pty Ltd can assist in any subsequent investigation and allow Stoline Pty Ltd to follow up with to seek any clarification or feedback.

You can raise your concerns or submit a whistleblower disclosure directly to Stoline Pty Ltd through any of the following methods:

Stoline Pty Ltd

Telephone: 1300 304 550

Email: stursulas@stopline.com.au

Mailing Address

A whistleblower should not use the whistleblower service to report a personal work-related grievance, a third-party complaint or a child protection incident that could be effectively managed through our normal internal processes

If a whistleblower disclosure is made through the whistleblower service that does not meet the threshold of reportable wrongdoing such as that listed above in section four of this Policy it may be referred by the the Stoline Pty Ltd representative to the appropriate department or staff member to manage (for example the Principal or Deputy Principal) and will be recorded as not being a disclosable matter. Protection of anonymity does not apply in the same strictness to disclosures that are not disclosable matters, however confidentiality will be maintained as appropriate.