



Policy

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Whistleblower protection

Reflection

"But in your hearts honour Christ the Lord as holy, always being prepared to make a defense to anyone who asks you for a reason for the hope that is in you; yet do it with gentleness and respect." Peter 3:15

Purpose

This Whistleblower Protection Policy is grounded in Catholic Education Diocese of Cairns' commitment to fostering a workplace culture that reflects sound governance and ethical practice, and that supports the effective identification, reporting, and management of Notifiable conduct and Reportable Conduct, as defined under the *Child Safe Organisations Act 2024 (Qld)*.

This policy provides protection to whistleblowers by establishing a mechanism for concerns to be raised on a confidential basis without fear of reprisal.

Policy

Catholic Education Diocese of Cairns (CEDC) encourages all persons covered by this policy to report Reportable Conduct (defined below) and is committed to protecting and supporting those persons who do so.

Any person who reports Notifiable Misconduct and/or Reportable Conduct under this Policy will not be personally disadvantaged by having made the report by:

- (a) dismissal;
- (b) demotion;
- (c) any form of harassment;
- (d) discrimination; or
- (e) current or future bias.

This protection does not extend to those whose engagement with the whistleblowing process is motivated by vexatious, malicious or dishonest behaviour. Such behaviour may be subject to misconduct processes consistent with breaches of the Code of Conduct.

Where a person who is a whistleblower is implicated in the wrongdoing, they will not be protected from the consequences flowing from their involvement in the wrongdoing itself. A person's liability for their own conduct is not affected by their reporting of that conduct under this policy.

The policy applies to all members of CEDC and to members of the general public who have access to, or information about CEDC, and might not be comfortable reporting relevant reportable conduct directly with their school or CES.

This policy does not relate to other forms of conduct such as misconduct of a sexual, physical or emotional nature. The appropriate management of these forms of conduct is dealt with separately under student protection reporting processes and Catholic Education grievance, misconduct and investigation processes. However, the whistleblower process is available where reportable conduct might apply to the failure of these processes.

The availability of the whistleblower process will be widely communicated through the CEDC community.

Rationale

Whistleblower

A **whistleblower** is a person to whom this Policy applies who, **acting in good faith**, reports Reportable Conduct or Notifiable misconduct in accordance with this Policy.

Notifiable Conduct

Notifiable Conduct is conduct by a person or persons connected with CEDC which, in the view of a whistleblower acting in good faith, is:

- Dishonest;
- Fraudulent;
- Corrupt;
- Illegal, including but not limited to theft, drug use or sale, violence or threatened violence, or criminal damage to property;
- In breach of Commonwealth or State legislation or local authority by-laws;
- Unethical, including breaches of the CEDC Code of Conduct;
- Other serious improper conduct;
- An unsafe work practice;
- Representative of gross mismanagement, serious and substantial waste, or repeated breaches of administrative procedures; or
- Likely to cause financial or non-financial loss to CEDC or its schools, or otherwise be detrimental to their interests.

Reportable Conduct

(Child Safe Organisations Act 2024)

Reportable conduct includes conduct towards a child that involves:

- A sexual offence committed against, with, or in the presence of a child;
- Sexual misconduct, including sexualised behaviour that does not amount to a criminal offence;
- Physical violence against or in the presence of a child;
- Ill-treatment or neglect of a child;
- Behaviour that causes significant emotional or psychological harm to a child;
- Failure to reduce or remove a known risk of child abuse;
- Concealment of a child abuse offence.

Related Definitions

- **Reportable allegation:** An allegation that an employee, volunteer, or contractor has engaged in conduct that may constitute reportable conduct.
- **Reportable conviction:** A finding of guilt by a court in Queensland or elsewhere for an offence involving reportable conduct.

Alignment with Church Integrity Principles

Whistleblowers who raise concerns in good faith act consistently with *Integrity in Our Common Mission* by:

- supporting a culture of safeguarding that prioritises the dignity, safety and wellbeing of children, adults at risk and the wider community, and that has zero tolerance for abuse or misuse of power;
- speaking out when actions, behaviours, language or environments may cause harm, and contributing to transparency, accountability and ethical conduct within the Church;
- acting with integrity, fairness and responsibility when concerns are identified or raised, including cooperating with appropriate reporting and response processes; and
- upholding the principles of **stewardship and justice**, recognising a shared responsibility to prevent misconduct, address wrongdoing appropriately, and maintain trust in the Church's mission and governance.

Whistleblower Disclosure Coordinator

For the purposes of this Policy, the **Whistleblower Disclosure Coordinator** is the **Diocesan Executive Manager, Professional Standards and Safeguarding Office (PSSO)**.

The PSSO may delegate the investigation of Reportable Conduct or notifiable conduct to a **Whistleblower Investigation Officer**. Any such delegate is bound by the same obligations of confidentiality and protections afforded to whistleblowers under this Policy.

Guiding Principles of the Policy

Ethical Culture

This Policy supports the commitment of CEDC and its schools to sound governance, ethical conduct, and accountability.

Confidentiality and Protection

CEDC will take all reasonable steps to protect the confidentiality of a whistleblower's identity, except where disclosure is required by law.

A worker who makes a disclosure:

- In good faith; and
- In accordance with this Policy

will be protected, so far as is reasonably practicable, from:

- Reprisal;
- Dismissal;
- Discrimination; or
- Any other unfavourable treatment arising from the making of the report.

Outcomes

1. Complaints Procedure

Persons to whom this policy applies are encouraged to refer suspected instances of Notifiable Misconduct and/or Reportable Conduct directly to the relevant Principal or line manager. However, in instances where a person is not comfortable reporting directly to such persons, they should use the confidential STOPline 'hotline' facility. This service is operated externally, securely and confidentially by an independent service provider in Melbourne.

STOPline can be accessed by any of the following:

Telephone (toll free): 1300 30 45 50

Fax: 03 9882 4480

Email: doc@stopline.com.au

Mail: c/o The Stopline, Locked Bag 8, Hawthorn Vic 3122

App: Search for Stopline in the iTunes App Store or Google Play to download the free app and submit a disclosure.

2. Investigation Procedures

STOPline will transmit reports it receives to the Whistleblower Disclosure Coordinator. When a report might implicate the PSSO, the report will be submitted to that team's line manager, the Executive Director of Catholic Education, and if that role is also implicated the report will be directed to the Bishop of Cairns or his delegate. Callers who advise of concerns that do not amount to reportable conduct will be redirected to other processes available to them for resolution.

Callers who advise of concerns that do not amount to Notifiable Misconduct and/or Reportable Conduct reportable conduct will be redirected to other processes available to them for resolution.

All reports of Notifiable Misconduct and/or Reportable Conduct will be subject to a thorough investigation.

The Whistleblower Disclosure Coordinator will investigate the report or may elect to appoint a Whistleblower Investigations Officer to investigate the matter. This will depend on the nature and extent of the allegation(s). The investigative process will be guided by the CEDC procedure on Employee Misconduct and Investigations and the Guiding Principles for Managing Unacceptable Workplace Behaviour, and other CEDC policies and procedures as might apply.

The person against whom the allegations are made will be informed accordingly. All reports and investigation procedures will be dealt with promptly.

3. Report Procedures

The Whistleblower Investigations Officer will submit a preliminary report to the Whistleblower Disclosure Coordinator on the outcome of any investigation. The report will provide a summary of the facts of the suspected Notifiable Misconduct and/or Reportable Conduct and of the investigation. It will also provide recommendations about whether an accusation is substantiated or unsubstantiated, whether the matter should be referred to the police, other disciplinary actions that may be required and, if warranted, suggested actions to recover stolen funds or property, and internal control implications.

The investigation report and recommendations will be provided by the Whistleblower Disclosure Coordinator to the CEDC Executive Director. If the report implicates the Executive Director, the Whistleblower Disclosure Coordinator may elect to report to the Bishop of Cairns or his delegate the Episcopal Vicar for Education. All recipients will be required to respond promptly.

The Professional Standards and Safeguarding Office will ensure full compliance with the Child Safe Organisation Act 2024 (Qld), including all obligations under the Reportable Conduct Scheme. It will also adhere to Catholic Education Diocese of Cairns Student Protection Processes, ensuring that all allegations of harm or abuse are managed in accordance with legislative requirements and diocesan policy. Furthermore, the Office will integrate its practices with the Reportable Conduct Policy to guarantee that all investigations and reporting align with statutory obligations and internal governance standards.

4. Monitoring and Follow-up

The Whistleblower will have access to information on the conduct and outcome of the investigation process through the STOPline facility.

The Whistleblower Disclosure Coordinator shall retain a coordinating role in monitoring the implementation of the recommendations of the final report.

5. Safeguards

Whistleblowers can rely on the protection afforded by this Policy. If a Whistleblower has any concerns regarding victimisation, discrimination or any other unfavourable treatment as a result of a report made

under this Policy, they should immediately contact the Whistleblower Disclosure Coordinator, either directly or through STOPline.

6. Governance

The Whistleblower Disclosure Coordinator will provide quarterly and adhoc reports (when required) to the CEDC Executive, Board of Governance, and the diocesan Audit Risk and Compliance Committee. The report will include the quantity and nature of reportable conduct, the outcome of investigations, and areas of concern. The timing and nature of the reporting will not compromise the integrity of investigations. Routinely, the Whistleblower Disclosure Coordinator will also report on the effectiveness of the implementation of this policy and suggest improvements.

Enquiries

Executive Leader, People and Culture

Executive Manager, Professional Standards and Safeguarding Office

Related Directives, Policies and Procedures

Veritas: [Whistleblower](#)

[Corporations Act 2001](#)

[Student Protection Reporting Processes and Guidelines](#)

[Code of Conduct - Staff](#)

Policy: [Conflict of Interest \(Staff\)](#)

Policy: [Workplace Discrimination and Sexual Harassment](#)

Policy: [Workplace Bullying](#)

Policy: [Grievance Policy \(Maintaining Right Relations\)](#)

Procedure: [Grievance Procedure \(Maintaining Right Relations\)](#)

Procedure: [Employee Misconduct and Investigation Processes](#)

Procedure: [Employee Unsatisfactory Performance Process](#)