



WHISTLEBLOWER PROTECTION POLICY

POLICY DETAILS			
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Responsible Officer	Rector	Review Date	2/07/2022
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Related College Documents	Risk Management Matrix Making Protected Disclosures Guidelines Whistleblowing Management Procedures		

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WHISTLEBLOWER PROTECTION POLICY

1.0 POLICY STATEMENT

To ensure high standards of professional and ethical conduct and culture within the workplace, Iona College Limited ABN 32 127 678 675 (**College**) believes it is vital that people can raise reasonably held concerns about conduct, practices and activities taking place within the College community without fear of reprisal.

The College encourages the disclosure of details relating to suspected improper conduct or wrongdoing. In specific circumstances such disclosures may be deemed an "**eligible whistleblower disclosure**". This affords legal protection to the eligible whistleblower and imposes legal obligations on the eligible recipient of the disclosure.

1.1. This policy defines those circumstances and explains the process followed at the College when an eligible disclosure is made.

Every person in, and associated with, the College has duty to disclose conduct that may affect the College being run ethically and in accordance with legislation, and its internal rules and policies.

1.2. If further information is required before making a disclosure, please contact the College's Human Resource Manager or Risk & Compliance Manager or one of our eligible recipients of disclosure officers (WIO or WPO).

Additionally, the Australian Securities and Investments Commission (ASIC) website provides further information on Whistleblowing.

2.0 PURPOSE OF THE POLICY

This policy and its supporting documents are provided to:

- i. Encourage the disclosure of suspected improper conduct or wrongdoing;
- ii. Guide potential whistleblowers to make disclosures safely and confidentially;
- iii. Protect whistleblowers from reprisal or any form of retaliation;
- iv. Encourage a transparent and prompt response to eligible disclosers; and
- v. Ensure that proven allegations are dealt with appropriately.

3.0 SCOPE

3.1. Legislative framework - *Corporations Act 2001 (Cth)*

- i. The *Corporations Act 2001 (Cth)* (CA) Part 9.4AAA provides for a consolidated whistleblower protection regime for Australia's corporate sector. All public companies must have a whistleblower policy (section 1317AI(1) CA).
- ii. As an Australian Public Company, Limited by Guarantee and registered as a charitable organisation under the Australian Charities and Not-for-Profits Corporation, the College is bound by the obligations in the Act.

3.2. Application of policy

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This policy applies to:

- i. Potential and actual "eligible whistleblowers".
- ii. Potential and actual "eligible recipients of an eligible disclosure".
- iii. Any other person in the College who may become aware of a potential or actual eligible disclosure.

Protections and obligations defined within this policy are applied whether or not the eligible whistleblower intended them to apply.

4.0 DEFINED PERSONS

4.1. Eligible whistleblowers

A person is eligible to be a whistleblower if that person is or has been:

- i. An employee, temporary or permanent (including current and former employees who are permanent, part time, fixed term or temporary, interns, secondees and managers).
- ii. An officer or director (usually a director or company secretary).
- iii. A contractor or an employee of a contractor who has supplied goods and/or services to the College (whether paid or unpaid) or is affiliated with the College.
- iv. An associate of the College (usually a person with whom the College acts in concert and can include students, volunteers and members of the College).
- v. A spouse, relative or dependant of anyone above.

4.2. Eligible recipients of disclosures

For a disclosure to be eligible for protection under this policy, the disclosure must be made to one of the following persons:

- i. A member of the College Board including a Director and Board Secretary.
- ii. A senior manager including the Rector, Principal, Manager of Corporate Services and public officers:
 - a. A senior manager is a person other than a Board Director or Board Secretary, who makes or participates in making decisions that:
 - i. Affects the whole or a substantial part of the College; or
 - ii. Has the capacity to significantly affect the College's financial standing.
- iii. A person the College has authorised to receive whistleblower reports.
- iv. An auditor or actuary engaged by the College.
- v. A nominated whistleblower investigation officer (**WIO**) and/or a nominated whistleblower protection officer (**WPO**)¹.
- vi. A legal representative of the person making the disclosure for the purposes of obtaining related advice.

¹ See sections 7.1 and 7.2 for definitions of WIO and WPO.

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- vii. The formal hotline/whistleblower contact point for regulated bodies and other external parties. This might include ASIC, APRA, the ATO or another entity.

A person making a disclosure may also have an obligation to make a report to a statutory body (e.g. under the *Child Protection Act 1999* (Qld)). In these cases, the person should ensure they comply with all such reporting requirements.

5.0 ELIGIBLE DISCLOSURES (eligible whistleblower matters)

5.1. Eligible matters

The CA specifies when a disclosure qualifies as an 'eligible whistleblower matter'. Persons who disclose matters that fall outside the eligible matters listed below will not be eligible for protections under the CA and the receiver will not be obligated to act.

For a disclosure to be protected under this policy, the discloser must have **reasonable grounds** to suspect that:

- i. Misconduct (i.e. dishonest, illegal or unethical behaviour) has occurred; or
- ii. An improper state of affairs or circumstances exists, including but not limited to:
 - a. any act or omission that constitutes, or may constitute, an offence against a law of the Commonwealth including the *Corporations Act 2001*.
 - b. any act or omission that constitutes, or may constitute, a breach of the College's internal rules and policies.
 - c. any act or omission that contravenes, or may contravene, a provision of the *Fair Work Act 2009*, the *Competition and Consumer Act 2010*, or the *Child Protection Act 1999* (Qld) including, but not limited to:
 - iii. harming the safety, wellbeing, and best interests of a child (section 5a of the CP Act).
 - iv. coercion used to exercise or not exercise a workplace right (section 343 of the FW Act).
 - v. adverse action due to membership/non-membership (section 346 of the FW Act).
 - vi. breach of right of entry notice requirements (section 487 of the FW Act).
 - vii. hindering or obstructing an entry permit holder (section 502 of the FW Act).
 - viii. dishonest or fraudulent conduct, including bribery and/or corruption.
 - ix. breach of duties as an officer or employee in relation to financial matters.

Deliberate false disclosures will be considered as misconduct and may result in disciplinary action.

The person making the disclosure is not required to prove their allegations.

The concern need not relate to illegal activity, it may be a systemic issue that has relevance to the governance or regulation of the College.

5.2. Ineligible matters

Disclosures that relate solely to personal work-related grievances, and that do not relate to detriment or threat of detriment to the discloser, do not qualify for whistleblower protection. If a College person has a work-related grievance to raise, they should follow the processes prescribed by the College's Grievance Policy.

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Personal work-related grievances are those that relate to the discloser's current or former employment and have, or tend to have, implications for the discloser personally, but do not:

- i. Have any other significant implications for the entity (or another entity); or
- ii. Relate to any conduct, or alleged conduct, about a disclosable matter as set out above.

Examples of grievances that may be personal or work-related grievances include:

- iii. An interpersonal conflict between the discloser and another employee; or
- iv. Decisions that do not involve a breach of workplace laws:
 - a. About the engagement, transfer or promotion of the discloser;
 - b. About the terms and conditions of engagement of the discloser; or
 - c. To suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

False or vexatious disclosures will not be considered an eligible whistleblower matter. A College person who makes a deliberate false or vexatious report may be disciplined and/or face liability for their actions.

5.3. Public interest and emergency disclosures

- i. A person having made a whistleblower disclosure can elect to make a public interest or emergency disclosure that also qualifies for protection.
- ii. The public interest or emergency disclosure must meet either the public interest or emergency disclosure test to ensure ongoing protection.
- iii. The disclosure may be made to a **member of parliament (Commonwealth or State) or qualified journalist** provided the criteria below are addressed.
- iv. The person intending to make the disclosure should seek independent legal advice on whistleblower protection prior to proceeding with a public interest or emergency disclosure.

5.4. Public interest test

A disclosure made in the public interest may also qualify the individual for whistleblower protection if:

- i. The individual has already made a qualifying whistleblower disclosure to an eligible recipient; and
- ii. 90 days have elapsed since the previous disclosure; and
- iii. The individual does not have reasonable grounds to believe that action has been or is being taken in response to the disclosure; and
- iv. The individual has reasonable grounds to believe that the disclosure is in the public interest; and
- v. The individual has provided one of the College's eligible recipients with notice of intent to make a public interest disclosure; and
- vi. The disclosure is made to a **member of Parliament (Commonwealth or State) or a qualified journalist;** and
- vii. The scope and volume of information provided in the public interest disclosure is limited, it should only provide the minimum necessary information to inform the recipient of the misconduct or improper state of affairs.

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5.5. Emergency disclosure test

An emergency disclosure may qualify the whistleblower for protection if:

- i. The whistleblower has already made an eligible whistleblower disclosure; and
- ii. The whistleblower has reasonable grounds for believing that the disclosure is associated with an imminent danger that affects the health or safety of one or more persons or to the environment in a substantial way; and
- iii. The whistleblower has provided one of the College's eligible recipients with written notice that clearly identifies the previous disclosure and states that the whistleblower intends to make an emergency disclosure; and
- iv. The emergency disclosure is made to a **member of Parliament (Commonwealth or State) or a qualified journalist**; and
- v. The scope and volume of information provided in the emergency disclosure is limited and should only provide the minimum necessary information to inform the recipient of the substantial imminent danger.

6.0 MAKING A DISCLOSURE (criteria to qualify for protection)

6.1. Guidance for persons making a disclosure

Before making a disclosure, the individual should confirm that they are an eligible whistleblower and the person they are disclosing to is an eligible recipient.

Contact details for the College's eligible recipients are included in [Appendix A](#) (not exhaustive). There are a variety of options available for making disclosures.

Whilst anonymity is fully supported, all whistleblowers are encouraged to consider providing their name and contact details. These details will be kept confidential. If the whistleblower is known to the investigators, this could facilitate confidential discussions and significantly improve the effectiveness of the investigation.

The person making the disclosure should provide as much information as possible. Evidence or information about how to obtain evidence will be valuable for the investigation.

6.2. Information for the whistleblower

- i. The College will take all reasonable steps to ensure their identity is protected and they are not exposed to detriment.
- ii. The matter will be investigated appropriately, and confidential reports will be shared with the senior executive and board members responsible for governance.
- iii. The investigators would benefit from the opportunity to discuss the disclosure, but anonymity may be maintained.
- iv. The whistleblower may remain anonymous and still be eligible for protection.
- v. The whistleblower will not necessarily be absolved from the workplace or legal consequences of their involvement in any misconduct that is apparent in this disclosure or comes to light through investigation.
- vi. The whistleblower must be made aware that they must also maintain confidentiality.

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6.3. Anonymity and confidentiality

- i. An individual may make a disclosure anonymously and maintain their anonymity. This will not affect the protections.
- ii. The individual making the disclosure can refuse to answer questions they feel will reveal their identity.
- iii. If the individual maintains anonymity, they are encouraged to stay in contact with the eligible recipient to support dialog and further questions. This will improve the quality of the investigation.
- iv. If a disclosure comes via email that is unidentifiable and remains that way, this should be treated as an anonymous disclosure.
- v. At any time after disclosure, the individual may choose to make their identity known and still maintain protections.
- vi. The individual making the disclosure must also maintain absolute confidentiality about the matter.

6.4. Maintaining confidentiality

- i. All communications with an anonymous whistleblower should be through the eligible recipient or a person designated.
- ii. The whistleblower seeking to maintain confidentiality may be identified by a pseudonym or a reference number.
- iii. If the whistleblower is known to the eligible recipient, with the permission of the whistleblower, a support person is to be provided to maintain contact. This may be the initial recipient, it is not to be the investigator.

6.5. Legal protections for persons making a disclosure

Protections provided to a whistleblower include the following:

- i. Unless specifically authorised under the Act, it is illegal for a person to identify a whistleblower or share information that may uncover the identity of a whistleblower.
- ii. A whistleblower may raise a complaint about breach of confidentiality by making another contact with an eligible recipient. Additionally, the whistleblower may raise a complaint with regulators like ASIC or the Australian Prudential regulation Authority (APRA).
- iii. Provided there are no overriding legal reasons, a disclosure may be made anonymously and remain anonymous. Confidentiality must be scrupulously maintained.
- iv. These protections will be provided whether the disclosure was made internally or externally.
- v. The College has an obligation to protect the whistleblower's identity. Every effort to ensure anonymity is required. The identity, if known, will only be shared with authorised persons. The WPO determines who is authorised in each case. The whistleblower may subsequently agree to be identified.
- vi. Details about the disclosure will also be protected. At all times, any information about the disclosure is classified as protected and access is to be restricted.
- vii. Disclosure of details about the concern may occur if:

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- a. The information does not identify the whistleblower.
 - b. The person disclosing has taken reasonable steps to deidentify the information to protect the whistleblower.
 - c. There are reasonable grounds to justify the release of the information to support completion of the investigation.
- viii. Where anonymity has been requested, the person making the disclosure must also maintain confidentiality and refrain from discussing the issue with anyone who is not authorised.
- ix. The whistleblower is also entitled to legal protections in relation to civil, criminal and administrative liabilities. Independent legal advice should be sought.
- x. The whistleblower may be entitled to compensation and other remedies court if they suffer loss, damage or injury for making the disclosure. It is the discloser's responsibility to bring any such action for compensation and to seek independent legal advice about what remedies may be available if loss, damage, or injury was suffered.

6.6. Protection from detrimental act or omissions

All people who make a protected disclosure are protected from reprisals or threatened reprisals under this policy, whether by act or omission, to their detriment, as a result of making that disclosure, including, but not limited to:

- i. Dismissal of an employee.
- ii. Injury of an employee in his or her employment.
- iii. Alteration of an employee's position to his or her detriment.
- iv. Discrimination between an employee and other employees of the same employer.
- v. Harassment or intimidation of a person.
- vi. Harm or injury to a person, including psychological harm.
- vii. Damage to a person's property.
- viii. Damage to a person's reputation.

There are significant legal penalties associated with detrimental conduct as described above.

These protections apply regardless of whether the disclosure has been made internally to the College or to ASIC.

A person is not automatically afforded immunity or exemptions from the consequences of their own misconduct or involvement in the reported misconduct when making a protected disclosure.

7.0 INVESTIGATION OF MATTERS

A qualified Senior Officer will be nominated by the College leadership or the Board of Directors to assess and manage the matter relating to the protected disclosure, address any outcomes or findings, and, if necessary due to a formal investigation, appoint a Whistleblower Investigation Officer and/or a Whistleblower Protection Officer.

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The **Nominated Senior Officer** must demonstrate that the matter relating to the protected disclosure has been satisfactorily managed, including but not limited to:

- i. Keeping the discloser informed.
- ii. Providing a satisfactory explanation in relation to the matter.
- iii. Resolving the matter by speaking to one or more parties.
- iv. Recording and monitoring the matter at that point in time.
- v. Making a decision to conduct an investigation.
- vi. Referring the matter to another agency;
- vii. Documenting the investigation findings.
- viii. A combination or variation of the above.

7.1. Whistleblower Investigation Officer

A WIO may be appointed by the Nominated Senior Officer to gather evidence, including interviewing witnesses, to communicate with the person reporting, the person under investigation and witnesses, and finally to prepare a report on their findings and recommendations.

7.2. Whistleblower Protection Officer

A WPO may be appointed by the Nominated Senior Officer to oversee the investigation process.

The evaluation and investigation of all whistleblower investigations is to be overseen by the WPO. The WPO is to ensure that the processes implemented are consistent with this policy and the related procedure.

A WPO, who remains independent of the investigation process itself, may be appointed by the Nominated Senior Officer to ensure disclosers/whistleblowers who report disclosable conduct are protected from reprisal in accordance with the provisions of the CA or this policy.

If a protected disclosure is made involving any Senior Officer, staff member, or contingent worker, that Senior Officer, staff member, or contingent worker shall remain independent of the details, assessment, management, and investigation of the matter.

No actions that may result in a detriment to those mentioned as a subject of disclosure may be taken until the conclusion of the investigation. This clause does not apply to interim actions taken to remove sources of danger, including but not limited to the mindful separation and exclusion of the affected individuals.

The outcome of the investigation must be reported to the Board upon conclusion of the investigation, while maintaining the confidentiality and protection of the discloser. If it is not possible to maintain confidentiality and report to the Board, a representative or representatives of the Board may be selected to receive and consider the report.

7.3. Natural justice and procedural fairness

All eligible disclosures are to be forwarded to the WPO, either directly from an eligible whistleblower or via an eligible recipient. Once made, a disclosure may not be withdrawn by the whistleblower. Should the WPO be the subject of the disclosure, another suitable person who is not connected to the disclosure will assume WPO responsibilities.

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The College is required to investigate each eligible disclosure. Investigations will observe the rules of natural justice and the provisions of procedural fairness relevant to the nature of the disclosure. Investigations will vary in their process, depth and complexity depending upon the nature of the disclosure. External experts may be engaged to conduct investigations, though that will not necessarily be the approach taken in every case. Any external party will also be bound by this policy.

All eligible disclosures are recorded in a protected register with restricted access.

The following key stages are followed by the WPO in conducting investigations:

- i. The WPO selects or appoints a suitable investigator and provides that investigator with terms of reference that include briefings on security of information, reporting and timeframes.
- ii. The investigation must be conducted in an objective and fair manner within the constraints of the nature of the disclosed matter.
- iii. Refer to the procedure for more information on the requirements for conducting an investigation.
- iv. The WPO determines when it is appropriate for the person or persons at the subject of this disclosure to be made aware of the disclosure.
- v. The WPO also coordinates providing appropriate feedback to the whistleblower if the individual is known to the WPO.
- vi. The investigator must prepare a report of findings and present that to the WPO.
- vii. The WPO ensures the report is appropriately escalated for action.

7.4. Availability of a support person

- i. The WPO will ensure that a suitable support person for the individual/s mentioned in the disclosure is made available.
- ii. The identity of the individual/s is to remain confidential throughout the process.
- iii. The support person must ensure that they are fully aware of the requirements within this policy, especially the aspects regarding confidentiality and protection of the whistleblower.
- iv. The support person must ensure the individuals involved are offered access to confidential independent employee assistance services.
- v. The support person should be present when the individual/s are provided with information about the outcome.

8.0 POLICY MANAGEMENT

8.1. Compliance, monitoring and review

The Rector is the primary policy officer, delegating implementation and management of this policy to the Principal, the Manager of Corporate Services, and their contingent workers.

Breaches of this policy may be considered a serious breach of College policies and procedures and will be managed in accordance with the College's Misconduct and Performance Management Processes.

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The Rector and the identified delegates will monitor all protected disclosures made, and ensure the assessment, management, resolution, and reporting of these matters, unless they are the subject of the disclosure.

The ongoing enforcement and application of this policy will be facilitated through training pertaining to the policy content, including the use of information sessions and published guidelines.

This policy is to be reviewed immediately after a substantial breach in policy, a failure to protect a discloser, or a failure to investigate a matter related to a protected disclosure. Otherwise the policy is to be reviewed in two years from the date of publication.

8.2. Reporting

All matters learned about through protected disclosures that may result in Severe or Catastrophic outcomes, in accordance with the Risk Management Matrix, must be communicated to the Board of Directors and the Leadership Team immediately, or their delegate if the disclosure relates to the Board or the Leadership Team members while maintaining the confidentiality and protection of the discloser.

The policy officer and identified delegates must provide the Board of Directors with quarterly reports of disclosures made, their statuses, and their outcomes, provided that confidentiality is maintained. Alternative lines of reporting may be necessary to ensure confidentiality is preserved.

8.3. Records management

This policy will be made available on the College website, intranet, and network drives.

The policy officer and delegates must maintain all records relevant to administering this policy in a recognised College recordkeeping system, including but not limited to:

- i. A register of Protected disclosure made.
- ii. Records of statements.
- iii. Records of investigation findings.
- iv. Evidence and statements.

8.4. Legislative compliance

- i. *Corporations Act 2001* (Cth)
- ii. *Fair Work Act 2009* (Cth)
- iii. *Privacy Act 1988* (Cth)

8.5. Industry standards

- i. ASIC Regulatory Guide 270 Whistleblower Policies

9.0 DEFINITIONS

TERM	DEFINITION
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Whistleblower	A person who informs on a person or organisation regarded as engaging in an unlawful or immoral activity.
Misconduct	Unacceptable or improper behaviour, especially by an employee or professional person.
Reasonable grounds	Reasonable grounds means facts and circumstances sufficiently strong to warrant a prudent person to believe that the facts and circumstances are true.
Detriment	The state of being harmed or damaged.
Grievances	A real or imagined cause for complaint, especially unfair treatment.
Reprisals	An act of retaliation.

10.0 FEEDBACK

Provide feedback about this document by emailing compliance@iona.qld.edu.au

11.0 VERSION HISTORY




DATE	VERSION HISTORY	DETAILS
19/12/2019	V1.0 Initial Draft	
13/03/2020	V1.1 Final Draft	Addition of appendices and minor proofing.
26/06/2020	V2.0 Final Draft	Lawyer revised draft with changes to document structure and phrasing.
02/07/2020	V21	Numbering and formatting changes



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12.0 DOCUMENTS RELATED TO THIS POLICY

12.1. Internal documents

Whistleblowing Management Procedures	 Whistleblowing Management Proceec
Making Protected Disclosures Guidelines	 Making Protected Disclosures Guidelir
Risk Management Matrix	 Risk Management Matrix.docx

12.2. External documents

1.	ASIC Regulatory Guide 270 Whistleblower Policies 13 November 2019
2.	Brown, A J et al, Clean as a whistle: a five-step guide to better whistleblowing policy and practice in business and government. Key findings and actions of Whistling While They Work 2, Brisbane: Griffith University, August 2019
3.	Parliamentary Joint Committee on Corporations and Financial Services: Whistleblower Protections 13 September 2017
4.	<i>Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)</i>



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APPENDIX A – CONTACT DETAILS FOR THE COLLEGE’S ELIGIBLE RECIPIENTS

ELIGIBLE RECIPIENT	CONTACT
The College’s Rector	Fr Michael Twigg OMI mtwigg@iona.qld.edu.au
The College's Principal	Trevor Goodwin goodwint@iona.qld.edu.au
The College’s Manager, Corporate Services	Susan Boban bobans@iona.qld.edu.au
Board Representative for whistleblowing matters	boardsecretary@iona.qld.edu.au