

# WHISTLEBLOWER PROTECTION POLICY

**APPROVED BY:**

EREA Board

**APPROVAL DATE:**

10 December 2019

**APPLICABLE TO:**

All in EREA

**SCHOOL ACTIONS:**

EREA Policy – Schools are to ensure their practices are consistent with this policy. A local policy is not required.

**LAST REVIEW DATE:**

December 2019

**NEXT REVIEW DATE:**

December 2023

**RELATED DOCUMENTS:**

*Guidelines – EREA Whistleblower Protection Policy*

*EREA Whistleblower Program – CompliSpace web-enabled content*

*The Charter for Catholic Schools in the Edmund Rice Tradition*

*EREA Code of Conduct*

*EREA Child Protection Policy*

*EREA Complaints Handling Policy*

*EREA Internal Grievance Policy*

*EREA Health & Safety Policy*

**POLICY STORED:**

EREA CompliSpace PolicyPlus

**Policy Statement:** Edmund Rice Education Australia (EREA) is committed to providing a supportive environment for any person making a Whistleblower disclosure and will use its 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.

The Guidelines to the Whistleblower Protection Policy outline the process by which EREA captures actual, planned or suspected 'wrongdoing' for which a person providing the disclosure considers cannot reasonably be managed through existing internal reporting procedures in the areas of child protection, health and safety, complaints management and internal grievances.

All groups within EREA: schools, entities and offices, will follow agreed guidelines and protocols.

**Rationale:** Termed as 'good governance', the Australian Charities and Not-for-profits Commission (ACNC) recommends and encourages all not-for-profit organisations, particularly those with a large number of volunteers, arrangements with third parties, or complex operating environments provide Whistleblower protections.

All in EREA are mindful of the messaging from the Royal Commission into Responses to Child Sexual Abuse and appreciate the importance of providing anonymity and protection for those within EREA who wish to report known or reasonably suspected 'misconduct' or 'wrongdoing'.

EREA's Whistleblower Protection Policy and accompanying Guidelines have been established to:

- Support the values of the EREA Charter and Touchstones;
- Embody the principles outlined in the EREA Code of Conduct;
- Support EREA's long-term sustainability and reputation;
- Comply with EREA's legal and regulatory obligations; and
- Align with best practice governance principles and standards.

**Principles:** A Whistleblower function is an important tool for assisting EREA to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosure. Furthermore, it aims to:

- Encourage disclosures of wrongdoing, in good faith;
- Help deter wrongdoing in accordance with EREA's risk management and governance framework;
- Ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- Ensure disclosures are dealt with appropriately and on a timely basis;
- Provide transparency around EREA's processes for receiving, handling and investigating disclosures;
- Support EREA's Charter, Touchstones and Code of Conduct;
- Support the long-term sustainability of EREA; and
- Meet with EREA's legal and regulatory obligations.

The services of an external service provider are utilised to allay concerns regarding the perception that internal methods may be compromised. The core functions of the external provider are to:

- Objectively and independently receive and assess disclosures;
- Protect the person's anonymity;
- Conduct investigations where required, either legislatively or at the request of EREA; and
- Appropriately escalate a qualifying disclosure to the designated delegation within EREA for further action or investigation.

**Key Responsibilities: EREA Board**

The EREA Board approves this Policy and ensures that appropriate guidelines are in place to assist all to comply with the Policy.

**Executive Director**

The Executive Director has responsibility for the implementation of this policy and the development and review of the accompanying guidelines.

**Principals**

Principals are responsible for the implementation of this policy and the development of local school procedures in accordance with the EREA Policy and accompanying Guidelines.

**Review:**

This policy will be reviewed every four (4) years unless there is a legislative or regulatory requirement to do so earlier.