



DIOCESE of
PARRAMATTA



WHISTLEBLOWER

Policy and Procedure

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1. DOCUMENT CONTROL

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2. POLICY STATEMENT

The following values underpin the work of the Diocese of Parramatta (**Diocese**):

As Catholics, we strive to develop and live as an active and welcoming Catholic community where people of all ages can draw closer to God, work together to build a Christian community, and are able to offer support to each other in growing to our full God-given potential.

In our lives we strive to witness God's love for us through the way we live our lives and through our outreach in service to one another.

Agencies, ministries and parishes of the Diocese are committed to the highest standards of legal, ethical and moral behaviour and seek to create and maintain open working environments in which workers are able to raise concerns regarding actual or suspected unethical, unlawful, fraudulent or undesirable conduct. The Diocese will not tolerate serious wrongdoing and encourages the disclosure of such conduct.

This Whistleblower Policy and Procedure (**Policy**) provides a mechanism for the disclosure of such conduct especially, when that conduct is alleged at senior levels (see Senior Person definition) in the Diocese.

3. PURPOSE

The purpose of this Policy is to:

- (a) encourage and support workers to report an issue if they genuinely believe a **Senior Person or Persons** have breached policies of the Diocese or the law and they are fearful of being the subject of adverse consequences if they report the matter;
- (b) demonstrate the commitment of the Diocese to a fair workplace and outline the process for managing matters of wrongdoing and misconduct at a senior level;
- (c) protect and support individuals who, in good faith, report wrongdoing which they reasonably believe to be corrupt, illegal or unethical on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment;
- (d) establish procedures that enable:
 - (i) identification of wrongdoing or unethical behaviour;
 - (ii) protection for those that make serious wrongdoing disclosures;
 - (iii) a clear reporting process to be available to Whistleblowers;
 - (iv) independent assessment, inquiry and investigation of disclosures made;
 - (v) clear roles of specific appointments for the investigation of reportable conduct and the protection and support of Whistleblowers;
 - (vi) resolution of the issue(s) identified; and
 - (vii) governance surrounding this policy and process.
- (e) respect and protect both Whistleblowers and persons who are the subject of disclosures by Whistleblowers from victimisation.

4. SCOPE

This Policy applies to all Diocesan Personnel (as defined in clause 5 below). It also applies to any other person or organisation who has a relationship with the Diocese (such as a supplier of goods or services) who wishes to make a Disclosure of misconduct or wrongdoing through the appropriate channels.

Given the diverse nature of the organisations within the Diocese, individual agencies, may adopt their own Whistleblower procedures specific to the requirements of their activities but such procedures must reflect the principles of this Policy. In the event of any inconsistency, this Policy will prevail.

Disclosures of reportable conduct must be based on information that is known to the person making the disclosure and made in good faith. The Whistleblower must have reasonable grounds to suspect the alleged conduct has occurred.

Nothing in this Policy impacts on the ability of the Diocese to deal with any Personnel in relation to matters arising in the ordinary course of their relationship with, and contractual duties to, the Diocese (for example separate performance or misconduct concerns). In the normal course of events, individuals should refer to the relevant policies and procedures established by their Employer to attempt to resolve any concerns before making a report of reportable conduct. For example, an individual may make a complaint of bullying in accordance with the process described in any relevant harassment, bullying and discrimination policy.

5. DEFINITIONS

In this Policy, the following terms will have the following meaning:

Term	Definition
Code of Canon Law	The revised Code of Canon Law for the Latin Church promulgated by His Holiness Pope John Paul II in 1983 and any other universal or particular legislation promulgated by the competent ecclesiastical authority
Disciplinary Action	Action taken by the Diocese to deal with any actual or perceived breach of policies, codes or other standards of work performance and/or conduct. The actions that may be taken when discipline is deemed necessary include the following: <ul style="list-style-type: none">• Verbal warning• Corrective actions/counselling• Official written reprimand• Disciplinary meeting with appropriate supervisor or manager• Final written warning• Detraction of benefits• Indefinite suspension or demotion• Termination
Disclosure	A disclosure of Reportable Conduct by a Whistleblower.

Employer	The entity which has ultimate authority and management responsibility for all Personnel within the relevant agency, ministry or parish
Personnel	All workers, contractors, consultants or volunteers of the Diocese. This also includes clergy and religious for the purposes of this Policy.
Procedural Fairness	<p>Procedural fairness is a legal principle that ensures fair decision making. Generally, procedural fairness requires decisions to be consistent with:</p> <ul style="list-style-type: none"> (a) the bias rule – that is, free from bias or apprehension of bias by the decision-maker (b) the evidence rule – that is, rational or based on evidence that is logically capable of supporting the facts (c) the hearing rule – that is, providing people likely to be adversely affected by decisions with an opportunity to: <ul style="list-style-type: none"> (i) present their case and (ii) have their response taken into consideration before the decision is made.
Reportable Conduct (for the purpose of this Policy)	<p>A report may be made under this Policy if you believe that a Senior Person has engaged in conduct which:</p> <ul style="list-style-type: none"> (a) is dishonest, fraudulent or corrupt, including soliciting, accepting or offering a bribe, facilitation payments or other such benefits; (b) is illegal (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state, federal or Canon Law); (c) is unethical or in breach of the policies of the Diocese, relevant agency, ministry and/or parish, such as dishonestly altering records or data, mismanagement of resources, improper behaviour relating to accounting, internal accounting controls or audit matters, insider trading, failure to keep accurate financial records, falsification of accounts or wilfully breaching any relevant Code of Conduct or other policy or procedure; or (d) is potentially damaging to the Diocese, an employee or third party, such as unsafe work practices, environmental damage, health risks or abuse of property or resources; (e) amounts to an abuse of authority; (f) may cause financial or non-financial loss to the Diocese, agency, ministry or parish or is conduct that could be detrimental to the interests or the reputation of the Diocese or the values of the Gospel; (g) involves unresolved harassment, discrimination, victimisation or bullying; (h) amounts to concealment of wrongdoing; or (i) involves any other kind of serious impropriety.
Senior Person	Any Personnel who in the opinion of the Discloser hold position with authority to make decisions on behalf of the Employer
Whistleblower	<p>A person who has knowledge of any matters which impact upon, or have the potential to impact upon, the ability of the Diocese to comply with its obligations under any Commonwealth and State legislation, regulations, or guidelines.</p> <p>Further, a Whistleblower is a person who, whether anonymously or not, makes or wishes to make a report in connection with wrongdoing regarding a person who holds a senior decision-making role within the Diocese and</p>

	where the reporter wishes to avail themselves of protection against reprisal for having made the report.
Whistleblower Protection Officer	A person appointed by the Diocese as a Whistleblower Protection Officer from time to time, who as at the date of this Policy shall be those persons listed in paragraph 7.2(b) below.
Whistleblowing	The disclosure by a witness, of suspected wrongdoing within an agency, ministry or parish that indicates serious wrongdoing as defined below.
Wrongdoing	Violation of standards of behaviour, suspected or alleged reportable conduct

6. PRINCIPLES

The Diocese adheres to the following principles:

- (a) **Ethical culture.**
This Policy supports the commitment by the Diocese to sound governance and ethical behaviour in the workplace.
- (b) **Confidentiality**
As far as reasonably possible, the identity of the Whistleblower will be protected except where the law requires his/her identification to be disclosed. Confidentiality to the subject of the Disclosure will also be maintained.
- (c) **Protection of Whistleblowers**
Any Personnel who make a Disclosure in good faith and in accordance with this Policy shall be protected as far as reasonably practicable against victimisation and retaliation as a result of making the Disclosure. Should victimisation or retaliation occur as a result of a person having made a Disclosure, the Diocese will treat it as serious wrongdoing under this Policy.
- (d) **Procedural Fairness**
Wherever possible the subject of a Disclosure will be provided with sufficient information in order for him/her to provide a full response to the Disclosure that has been made against him/her. In some cases certain details may not be provided if there is a concern that this may compromise the investigation process, the safety or well-being of a person or confidence in the Whistleblower procedures.

7. THE WHISTLEBLOWER PROCESS

7.1 Reporting Serious Wrongdoing

All Personnel are encouraged to report to their agency, ministry or parish priest anything which they suspect may be a serious breach of internal policies or the law by a senior person.

The following reporting mechanisms are available to personnel who become aware of an issue or behaviour believed to constitute a breach of the Code of Conduct or policies of the agency, ministry or parish or the law:

- (a) Whistleblowers may disclose any wrongdoing to their immediate supervisor, manager or another senior supervisor within the Diocese or to a Whistleblower Protection Officer. A supervisor in receipt of any such report must take the matter to a Whistleblower Protection Officer.
- (b) Whistleblowers may also:
 - (i) prepare a written Disclosure and send it:
 - (A) by email to a Whistleblower Protection Officer at Whistleblower@parracatholic.org; or
 - (B) by post to 'Whistleblower Protection Officer', Bethany Centre 470 Church Street, Parramatta NSW 2150.

- (c) If the Whistleblower does not feel comfortable making a Disclosure internally, it may also make a disclosure to the following external entity:

Makinson d'Apice Lawyers (Attention: Joanne Grant, Partner)
Address: Level 10, 135 King Street, Sydney NSW 2000
Postal address: GPO Box 495, Sydney NSW 2001
Email address: jgrant@makdap.com.au
Telephone: (02) 9233 7788

- (d) On receipt of a Disclosure, the person receiving it must ask the Whistleblower whether he or she consents to the disclosure and/or his/her identity being shared with appropriate persons. This can enable the disclosure to be investigated properly and the Whistleblower to be protected and supported as contemplated by this Policy.
- (e) Any communication under this Policy will be dealt with in a timely, sensitive and confidential manner.

7.2 Whistleblower Protection Officers

- (a) The Bishop will from time to time designate certain persons as to act as Whistleblower Protection Officers for the purposes of this Policy to ensure that a Whistleblower is protected from personal disadvantage as a result of making a report.
- (b) As at the date of this Policy, the following senior members of staff have been designated as Whistleblower Protection Officers:
- (i) Vicars General
 - (ii) Chancellor
 - (iii) Chief of Operations & Finance
 - (iv) Chancellor (Ministries)
 - (v) Human Resources Manager
 - (vi) Head of Safeguarding
- (c) A Whistleblower may report a Disclosure to any person designated as a Whistleblower Protection Officer.
- (d) The role of the Whistleblower Protection Officer is to provide the Whistleblower with practical support. Before a person is appointed as the Whistleblower Protection Officer for a matter, the Whistleblower Protection Officer will first be required to sign a declaration that he/she has no interest in the relevant Disclosure.
- (e) The Whistleblower Protection Officer will meet with the Whistleblower as soon as possible after they receive the disclosure.
- (f) The Whistleblower Protection Officer:
- (i) will report directly to the Bishop (who may delegate this responsibility to the Vicar General from time to time);
 - (ii) is responsible for assessing Whistleblower disclosures of wrongdoing and overseeing the investigation and resolution of such disclosures;
 - (iii) must assess and make recommendations to the Bishop about the nature and scope of support services that may be required for a Whistleblower, which may include:
 - (A) access to independent confidential professional counselling for the Whistleblower and his or her family;

- (B) complimentary preliminary legal advice; and
 - (C) other services as required.
- (g) Where administrative support is required by the Whistleblower Protection Officer, Human Resources will assist. In addition:
 - (i) the Diocesan Human Resources Manager will assist where the Disclosure relates to Catholic Education or CatholicCare; and
 - (ii) Catholic Education's Head of People and Culture will assist where the Disclosure relates to Chancery.
- (h) Whistleblower Protection Officers will be offered training where required. Should a Whistleblower Protection Officer not carry out his/her duties in an honourable manner, for example, by not acting on a Disclosure, he/she may themselves be subject to Disciplinary Action in accordance with this Policy. In that event, another Whistleblower Protection Officer will be assigned to the Whistleblower.

8. INVESTIGATION

8.1. Overview

The Diocese will investigate all Disclosures as soon as possible after they are received.

The relevant Whistleblower Protection Officer will appoint an independent and external investigator to assist in the investigation of the Disclosure. At all times, the Whistleblower must be supported and kept informed of the progress of the investigation (where appropriate) by the Whistleblower Protection Officer assigned to them.

The Whistleblower Protection Officer assigned to a Disclosure must ensure that the investigation of that Disclosure is conducted in an objective and fair manner.

8.2. Procedure

Following receipt of a Disclosure, the following procedure is to be followed:

- (a) The Whistleblower Protection Officer will meet with the Whistleblower as soon as possible after receiving the Disclosure.
- (b) The Whistleblower Protection Officer assesses and manages the risks and action required regarding the Disclosure and informs the Bishop of such risks and actions. Where the Disclosure involves the Bishop it will be escalated as prescribed in Canon 436 of the Code of Canon Law.
- (c) The Whistleblower Protection Officer will coordinate the provision of the appropriate services and support available to the Whistleblower.
- (d) As part of the assessment process the Whistleblower Protection Officer will determine if, in the case that the subject of a report is a parish priest, administrator or assistant priest and the matter is not covered by civil law or legislation but is a church related matter, the content of the report may be more appropriately dealt with under the Code of Canon Law.
- (e) The Whistleblower Protection Officer will undertake a risk assessment which includes advising on the appropriate working arrangements for the relevant parties

- (being the Whistleblower and the person(s) who are the subject of the Disclosure) as considered suitable in the circumstances and in accordance with employment and other relevant laws. This may include standing a worker down, or making interim alternative work arrangements.
- (f) If during the assessment process, the relevant Whistleblower Protection Officer determines that the Disclosure may constitute Reportable Conduct, he/she will engage a qualified, independent external Investigation Officer to investigate. The Investigation Officer must agree to abide by the provisions of this Policy at the time of their engagement and before they commence their investigation.
 - (g) The Investigation Officer will thoroughly investigate the Disclosure as required having regard to the nature of the Disclosure and the Whistleblower Protection Officer will assist him/her to have access to the resources required, including, where necessary, the assistance of other workers or external professional help (including lawyers, accountants, forensic analysts or operational experts).
 - (h) The investigation will adhere to the principles of Procedural Fairness.
 - (i) The Investigation Officer will be responsible for planning and conducting the investigation.
 - (j) It is an expectation of the Diocese that a Whistleblower will co-operate (where appropriate) with any investigation process arising from their Disclosure. The Whistleblower Protection Officer will inform the Whistleblower of this during their original meeting with the Whistleblower held in accordance with **paragraph 7.2(e)**.
 - (k) The person against whom a Disclosure has been made will be informed of the substance of the Disclosure, and provided with sufficient details to enable them to respond in accordance with Procedural Fairness. The information provided will not include the identity of the Whistleblower unless the Whistleblower has consented to this or it is necessary to do so for any of the reasons listed at **paragraph 12**.
 - (l) The Investigation Officer will make factual findings on any Disclosure made and those findings must be made on the balance of probabilities based on verifiable evidence.
 - (m) The Investigation Officer must prepare an Investigation Report setting out their findings and deliver it to the Whistleblower Protection Officer.
 - (n) Upon receiving the Investigation Report, the Whistleblower Protection Officer will then brief the Bishop on the Investigation Officer's assessment and findings, and make a recommendation. The Bishop will then make a determination as to the outcome of this process.

9. COMMUNICATION WITH THE WHISTLEBLOWER

Where possible, the Whistleblower will be provided with regular updates by the Whistleblower Protection Officer about the progress of the investigation (subject to any applicable privacy and confidentiality considerations).

Whistleblowers must maintain the confidentiality of all such reports, and not disclose details to any person, unless required by law.

10. POSSIBLE OUTCOMES

The following are expected to be the usual outcomes and responses to investigation findings:

- (a) If the finding is that a Disclosure has been disproven or not sustained due to lack of evidence, the Whistleblower will be informed at the earliest possible opportunity and, subject to **paragraph 10(c)** below, no further action will be taken in respect of the Disclosure.
- (b) If the finding is that a Disclosure shows that a person has engaged in Reportable Conduct, the Diocese (or the relevant agency, ministry or parish) will take such Disciplinary Action against that person as it deems appropriate in the circumstances. Any matters of a criminal nature will be reported to the Police and, if appropriate, other regulatory authorities.
- (c) If a Whistleblower considers that their Disclosure has not been dealt with in accordance with this Policy or they have been subject to retaliation as a result of making the Disclosure, the Whistleblower may:
 - (i) report this to their Whistleblower Protection Officer; and/or
 - (ii) give notice to their Whistleblower Protection Officer that they wish to exercise their right to an external appeal of the findings of the investigation. In that event, the Whistleblower Protection Officer will cause the matter to be referred to an independent arbitrator from outside the Diocese as nominated by the Bishop. The matter will then be dealt with in accordance with the arbitrator's usual rules of arbitration.
- (d) If the Whistleblower is not satisfied with a decision of the arbitrator, he or she may refer the matter to the Bishop for further determination and the Bishop's decision shall be final.

11. REPORTING OF INVESTIGATION FINDINGS

As soon as practicable after receiving the findings of an investigation, the Whistleblower Protection Officer will advise the Whistleblower (in person where possible), of such findings.

This communication does not entitle the Whistleblower to be informed of employment or other personal implications for the subject of the Disclosure and this communication must consider privacy of the subject of the Disclosure as well as the interests of the Whistleblower.

The Whistleblower Protection Officer will also continue to work with the Whistleblower to ensure that any issues arising during the course of the investigation or any concerns that the Whistleblower has raised regarding their continuation in their role in the Diocese are addressed.

At the end of an investigation, all findings and recommendations will be reported by the Whistleblower Investigation Officer to the agency, ministry or parish leader and/or the Bishop and an appropriate response will be determined. This response will address any Reportable Conduct and explore mitigation controls to minimise the future risk of serious wrongdoing in the workplace.

12. WHISTLEBLOWER ANONYMITY

The Diocese is committed to protecting the confidentiality of the disclosures it receives under this Policy.

The Diocese is also committed to protecting the anonymity and confidentiality of a Whistleblower where that person has specifically requested that protection.

It is important to note however, that the Diocese may be compelled to disclose the Whistleblower's identity if:

- (a) the disclosure is required by law;
- (b) the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety;
- (c) it is necessary to protect or enforce the legal rights or interests of the Diocese;
- (d) it is necessary to defend any claims; or
- (e) the person making the report requests that their identity is disclosed.

The Diocese must use its best endeavours to inform a Whistleblower before revealing his or her identity for any of the reasons listed above.

Any breach of confidentiality of the information provided by the Whistleblower, or a Whistleblower's identity, will be subject to a separate investigation and, if proven, will be subject to Disciplinary Action (as appropriate in the circumstances).

13. WHISTLEBLOWER PROTECTION

The Diocese and the agency, ministry or parish will take all reasonable action to mitigate the risks facing a Whistleblower who reports matters in good faith. The Diocese may, at its discretion, grant a Whistleblower immunity from disciplinary proceeding relating to matters that may come to light as a result of his/her Disclosure. However, he/she must continue to adhere to his/her obligations to the Diocese, including any relevant policies in relation to security and privacy of Diocesan information at all times. The Diocese cannot grant immunity against criminal prosecution or third party legal proceedings.

A Whistleblower who is subjected to detrimental treatment as a result of making a Disclosure in good faith under this Policy should inform their Whistleblower Protection Officer immediately. Detrimental treatment includes dismissal, demotion, harassment, discrimination, Disciplinary Action, bias, threats or other unfavourable treatment connected with making a report.

If a Whistleblower considers him or herself to be “at significant risk” of retaliation as a result of making a disclosure, they may request that positive action be taken in relation to the protection, for example, they may request to be allowed to take leave or work from home for the duration of the investigation. Wherever possible, such requests will be met and, if they cannot be, the Whistleblower will be provided with an explanation as to the reason(s) it is not possible.

Personnel who are found to have retaliated against a Whistleblower will be liable to Disciplinary Action, which may include termination of their employment.

14. PROTECTION FOR THE SUBJECT OF THE DISCLOSURE

Protections given to the subject of a Disclosure include that:

- (a) the Diocese will take all reasonable steps to protect the privacy of the subject of the Disclosure having regard to the possible personal implications for the subject of the Disclosure, including but not limited to their employment by the Diocese;
- (b) the Diocese will take all reasonable steps required to protect the confidentiality of the subject of the Disclosure and the associated investigation;
- (c) the Diocese will conduct all investigations on the basis that the investigation is a neutral fact-finding process and not an accusation. The subject of the Disclosure will be informed of the substance of the Disclosure and given the opportunity for input and will be given a right of response.
- (d) The subject of the Disclosure will have the right to representation throughout the course of an investigation;
- (e) The subject of the Disclosure will have the right not to be discriminated against as a result of the Disclosure being made (although this does not prevent the Diocese from taking Disciplinary Action against the subject of the Disclosure if the investigation finds that the person has engaged in Reportable Conduct).
- (f) The subject of the Disclosure will have the right to request to take leave during the course of the investigation (although the subject of the Disclosure will only have the right to take the leave that would otherwise be available to them, for example, accrued annual leave or leave without pay).
- (g) The subject of the Disclosure will have the right to be informed of the outcome of the investigation.
- (h) If the subject of the Disclosure is not satisfied with the outcome of an investigation, they may report this to the Whistleblower Protection Officer who acted in respect of the relevant Disclosure. In that event, the Whistleblower Protection Officer will cause the matter to be referred to an independent arbitrator from outside the Diocese as nominated by the Bishop. The matter will then be dealt with in accordance with the arbitrator's usual rules of arbitration. If the subject of the Disclosure is not satisfied with a decision of the arbitrator, he or she may refer the matter to the Bishop for further determination and the Bishop's decision shall be final.

15. FALSE WRONGDOING REPORTS

Where it is established that the Whistleblower has knowingly made a false Disclosure (including where the Disclosure is malicious), he or she may be subjected to disciplinary proceedings, which may result in dismissal. A determination that someone knowingly made a false Disclosure needs to be based on verifiable evidence.

The fact that a Disclosure is not found to be sustained (due to lack of evidence or is otherwise found to be false) should not be viewed as conclusive evidence that the Disclosure was knowingly falsely made.

Whistleblowers must ensure that, as far as possible, reports are factually accurate, based on first-hand knowledge, and are without material omission.

Whistleblower Protection Officers must advise Whistleblowers of the importance of any Disclosure being made in good faith at the time that they have their original meeting with the Whistleblower in accordance with clause **7.2(e)**.

16. DOCUMENT RETENTION AND CONFIDENTIALITY

All information, documents, records and reports relating to the investigation of an Disclosure will be confidentially stored and retained by the Chancellor in an appropriate and secure manner. Any unauthorised release of such information to someone not involved in the investigation of a Disclosure without the consent of the Chancellor and the Whistleblower will be a breach of this Policy.

It is important that whistleblowers feel assured that any release of information in breach of this Policy will be regarded as a serious matter and will be dealt with under the Diocesan disciplinary procedures.

17. REVIEW

The Whistleblower Protection Officer will refer to the Bishop for review by the relevant authorities any systemic, governance or management issues arising out of a Disclosure that may require review in order to mitigate the risk of recurrence of wrongdoing in the future.

Diocesan Human Resources will provide periodic reports to the Bishop, analysing trends and issues arising from Disclosures as required.

18. FURTHER INFORMATION

Should any Personnel require further information about this Policy, they should contact any of the persons appointed as a Whistleblower Protection Officer as listed at **paragraph 7.2(b)** above.

Given at Parramatta, New South Wales on this sixteenth day of May, two thousand and nineteen.



Bishop of Parramatta

Notary