

Agency Whistleblowing Policy



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Introduction

CatholicCare Diocese of Broken Bay (CatholicCare) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report misconduct.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts towards anyone who intends to report or has reported misconduct.

A whistleblower is an insider within an organisation who reports misconduct, dishonesty or illegal conduct that has occurred within the same organisation. This policy has been developed so that people can raise concerns regarding situations where they believe that CatholicCare or anybody connected with CatholicCare has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct.

Our contracts with NSW Government Agencies also provide public interest disclosure protection under the [Public Interest Disclosures Act 2022 \(PID Act\)](#) for relevant whistleblowers who provide voluntary public interest disclosure or witness 'serious wrongdoing'. For further information see CatholicCare's [Public Interest Disclosure Policy](#).

Purpose

The policy aims to promote a culture of openness, integrity, and accountability by providing a secure mechanism for reporting suspected misconduct, illegal activities, or unethical behaviour within CatholicCare. It ensures that whistleblowers are protected from retaliation and that disclosures are handled confidentially and appropriately.

The purpose of this policy includes the following:

- To encourage more reporting of wrongdoing, in good faith, if they know or have reasonable grounds to suspect such conduct,
- To help deter wrongdoing, in line with the entity's risk management and governance framework,
- To ensure individuals who report wrongdoing can do so safely, securely and with confidence that they will be protected and supported,
- To ensure reports are dealt with appropriately and on a timely basis,
- To provide transparency around the entity's framework for receiving, handling and investigating reports,
- To support CatholicCare's values and Code of Conduct,
- To support the entity's long-term sustainability and reputation,
- To meet CatholicCare's legal and regulatory obligations, and
- To align with the Not for Profit Governance Principles, the ASX Corporate Governance Principles; recommendations and relevant standards.

This policy is a very important tool for helping CatholicCare to identify wrongdoing that may not be uncovered unless there is a safe and secure means for reporting wrongdoing.

Nothing in this policy is intended to change or take away any other protections which may be available at law.

This policy:

- Forms a part of CatholicCare's risk management system and corporate governance framework.
- Is one of the mechanisms in CatholicCare's risk management tool kit for identifying wrongdoing.
- Is available to all employees.

Policy Statement

CatholicCare will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts towards anyone who intends to report or has reported misconduct.

CatholicCare is committed to:

- Creating a positive and open environment where staff feel they come forward to make a disclosure.
- Having practices in place to ensure that:
 - Disclosures are taken seriously, acted on and addressed,
 - Disclosers are provided with adequate protection and support, and
 - Early interventions are made to protect disclosers from detriment.

Scope

This Whistleblowing policy applies to anyone who has or is working for us or doing something in connection with their work for us. It includes current staff, contractors, authorised carers, work experience students, volunteers, members of the Advisory council, suppliers or consultants.

Although they are under no obligation to do so, any associate, family member or dependant of any person in the above groups of people may also speak up. If they choose to speak up in line with this Policy, we will extend to them the relevant rights and protections under this Policy.

Any person defined in the above may make a report under this policy.

Principles

Higher Standard

This policy is designed to comply with CatholicCare's legal obligations. If anything in this policy is inconsistent with any law imposed on CatholicCare, that legal obligation or the "higher standard" will prevail over this Policy.

Speak Up and Report It

If you have seen or have reasonable grounds to suspect misconduct, dishonesty or illegal conduct, concerning our organisation - report it.

Our Expectation of Staff

CatholicCare expects staff to act honestly and ethically, and to make any report on reasonable grounds.

Our Responsibility to Whistleblowers

CatholicCare will provide protection for Whistleblowers as set out in this policy.

Confidentiality and Consent

CatholicCare will maintain confidentiality of all reports and protect the identity of reporters to the fullest extent possible. While CatholicCare encourages Whistleblowers to identify themselves to a Whistleblower Officer, you may opt to report your concerns anonymously through our external provider.

What may be reported?

A person may report any information that the person has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to:

1. CatholicCare OR
2. A related entity of CatholicCare

Conduct that should be reported is any past, present or likely future activity, behaviour or state of affairs considered to be:

- Dishonest
- Corrupt (including soliciting, accepting or offering a bribe, or facilitating payments or other such benefits)
- Fraudulent
- Illegal (including theft, drug sale or use, violence or threatened violence, or property damage)
- In breach of regulation, internal policy or code (such as our Code of Conduct)
- Improper conduct relating to accounting, internal controls, compliance, actuarial, audit or other matters of concern to the whistleblower
- A serious impropriety or an improper state of affairs or circumstances
- Endangering health or safety
- Damaging or substantially risking damage to the environment
- A serious mismanagement of CatholicCare's resources
- Detrimental to CatholicCare's financial position or reputation
- Maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives)
- Concealing reportable conduct

Conduct usually relates to the conduct of employees or managers, but it can also relate to the actions of a third party, such as a funder, customer/client, supplier or service provider.

Personal work-related grievances

Personal work-related grievances are **NOT matters of misconduct which can be reported under this policy** and are not matters which provide specific whistleblower protections to the whistleblower under Australian law. They may have implications for the whistleblower personally but do have significant implications for the organisation or do not relate to misconduct disclosable under this policy.

Examples of personal work-related grievances include:

- An interpersonal conflict between the whistleblower and another employee.
- A decision that does not involve a breach of workplace laws.
- A decision relating to the engagement, transfer or promotion of the whistleblower.
- A decision relating to the terms and conditions of engagement of the whistleblower.
- A decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.

Personal work-related grievances should be internally raised using the [Resolving Workplace Issues \(Staff Grievance\) Policy](#).

Reporting Misconduct or Serious Wrongdoing

A report may be made:

1. Internally to a Whistleblower Officer in our organisation
2. To CatholicCare's nominated independent whistleblower service provider – "WBS".
3. Via the Public Interest Disclosure process in circumstances where this applies. - see [Public Interest Disclosure Policy](#) for details.

CatholicCare will also protect individuals who have made a report in connection with CatholicCare:

- To the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) or another Commonwealth regulatory body prescribed in legislation,
- To a legal practitioner for the purposes of obtaining legal advice or legal representation about whistleblower protections,
- That qualifies as an emergency or public interest disclosure under section 1317AAD of the [Corporations Act 2001\(Cth\)](#). It is important that you understand the criteria for making a public interest or emergency disclosure and you may wish to consult an independent legal adviser before making a public interest or emergency disclosure, or
- That qualifies as a public interest disclosure for relevant staff under the [NSW Public Interest Disclosure Act 2022](#).

You must make the report 'in good faith'. This means your report must be honest and genuine and motivated by wanting to report misconduct. Your report will not be 'in good faith' if you have any other secret or unrelated reason for making the report.

Making a report internally

We support openness and teamwork. This policy is not intended to replace our first obligation to resolve issues quickly and internally where appropriate. All reasonable attempts to resolve an issue should first be tried.

You are encouraged to raise concerns as early as possible with your supervisors and managers and to resolve misconduct informally and internally.

If you do not feel safe or able to raise misconduct with your supervisor or manager, you may make a report to any of the following Whistleblower Officers:

Name & Position	Location	Contact Details
Angela Gatama Executive Manager, People & Culture	Level 7 Head Office Caroline Chisholm Centre	P: 02 9481 2628 M: 0447 570 842 E: angela.gatama@catholiccaredbb.org.au
Patrick Ainsworth Chief Financial Officer	Level 7 Head Office Caroline Chisholm Centre	P: 02 9481 2644 M: 0417 207 714 E: patrick.ainsworth@catholiccaredbb.org.au
Angela Thomas Executive Manager Quality, Safeguarding, Risk and Compliance	Level 7 Head Office Caroline Chisholm Centre	P: 02 9481 2683 M: 0481 602 055 E: angela.thomas@catholiccaredbb.org.au

Making a report to our independent service provider – "WBS"

If for any reason you do not feel safe or able to make a report internally you may do so to our independent whistleblower service provider, "WBS".

To make an "Online" report, please click on this [link](#) or go to the WBS internet address listed below. You will be redirected to the new page where you need to enter 'CATHOLICCARE' in the 'Unique Key' field. You will then be asked for your "Client Reference Number" which is '5yezq'.

You will be asked to report the wrongdoing on an electronic form which is entirely between you and WBS. Your identity, information and privacy will be protected by secure 256-bit encryption and you will be able to upload documentation and/or other evidence that you may have to support your information.

Please bear in mind that the information you disclose may mean that:

- You can be identified – please ensure that the information is focused on what happened and not necessarily how it was observed
- You might disclose your identity (through position/title/role or the connection with the people with whom you have a concern)

Once you lodge a report, you will be provided with your own unique number which will be up to 20 characters long. Please keep a record of the unique number. It will be important if you wish to resume a report, upload more information for your disclosure or monitor progress of your disclosure.

"WBS" reporting options include:

Website	https://www.whistleblowingservice.com.au/catholiccare/ Available 24/7
Telephone	1800 730 073 Available 24/7

In the event a report received by "WBS" relates to a Whistleblower Officer, "WBS" will exclude that Whistleblower Officer from all communications when providing the report to our organisation. The Whistleblower Officers who are not named in the report will then receive and determine how the matter will be addressed or investigated as required.

"WBS" remains an independent intermediary at all times and will only communicate with those authorised within our organisation.

National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact "WBS" online or through the National Relay Service. Simply choose your contact method at [National Relay Service](#) and request "WBS's" hotline 1800 730 073.

Where can I get information and advice?

Further information can be found on the WBS website at <https://www.whistleblowing.com.au/catholiccare/>

If you need further information and advice about making a report or the support and protection available you may discuss the matter in confidence with your immediate supervisor, manager or any member of the Senior Leadership Team.

Note: In the event you do not formally make a report we may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

Do I have to disclose my identity?

There is no requirement for a whistleblower to identify themselves in order for a disclosure to qualify for protection under the Corporations Act. A whistleblower can:

- Choose to remain anonymous while making a report, over the course of the investigation and after the investigation is finalised, and
- Refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.

CatholicCare encourages whistleblowers who wishes to remain anonymous to maintain ongoing two-way communication with CatholicCare, so CatholicCare can ask follow-up questions or provide feedback.

Will my identity be treated confidentially?

Your identity will not be disclosed by "WBS" or CatholicCare unless:

- You consent to disclosing your identity.
- The disclosure is required by law.
- It is necessary to prevent a serious threat to a person's health or safety.
- It is reasonably necessary for investigating the issues raised in the report.

Where the Identity of the Whistleblower is disclosed, the identity of the whistleblower will remain confidential unless disclosure is required by law or with the whistleblower's consent.

Where anonymity is requested CatholicCare has in place the following measures and mechanisms for protecting the confidentiality of a whistleblower's identity; reducing the risk that the whistleblower will be identified from the information contained in a report:

- All personal information or reference to the whistleblower witnessing an event will be redacted.
- The whistleblower will be referred to in a gender-neutral context.
- Where possible, the whistleblower will be contacted to help identify certain aspects of their report that could inadvertently identify them.
- Reports will be handled and investigated by qualified staff.
- Secure record-keeping and information-sharing processes involving:

- All paper and electronic documents and other materials relating to reports will be stored securely,
- Access to all information relating to a report will be limited to those directly involved in managing and investigating the report,
- Only a restricted number of people who are directly involved in handling and investigating a report will be made aware of a whistleblower's identity (subject to the whistleblower's consent) or information that is likely to lead to the identification of the whistleblower,
- Communications and documents relating to the investigation of a report will not to be sent to an email address or to a printer that can be accessed by other staff, and
- Each person who is involved in handling and investigating a report will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a whistleblower's identity may be a criminal offence.

An unauthorised disclosure of:

- The identity of a whistleblower; or
- Information that is likely to lead to the identification of the whistleblower where the information was obtained because of the report,

will be regarded as a disciplinary matter and will be dealt with in accordance with CatholicCare's disciplinary procedures. See [Managing Unsatisfactory Performance and Misconduct Policy](#). It is also an offence/contravention under the *Corporations Act* which carries serious penalties for individuals and companies. If you are a whistleblower of a reportable matter and your identity is revealed without your consent, you may also be eligible to claim compensation and remedies under the Act.

As a whistleblower you should be aware that in practice, people may be able to guess your identity if:

- You have previously mentioned to other people that you are considering making a report,
- You are one of a very small number of people with access to the information, or
- Your report relates to information that you have previously been told privately and in confidence.

You can lodge a complaint with us if you believe a breach of your confidentiality as a whistleblower has occurred by contacting a Whistleblower Officer.

You can also lodge a complaint with a regulator including ASIC, if you believe a breach of your confidentiality as a whistleblower has occurred.

Protections

Whistleblowers have the same protected rights as other employees. If a whistleblower makes a report and an adverse action is taken against the whistleblower by their employer, they are able to seek general protections under relevant workplace legislation. If you believe that an adverse action has been taken against you (or may be taken against you) because you are a whistleblower and have made a report, you can seek advice and information about general protections available to you by visiting the [Fair Work Ombudsman's website](#) or contacting them on 13 13 94. 8am – 5.30pm Monday to Friday (except for public holidays).

CatholicCare will do everything reasonably possible to support and protect anyone who:

- Intends to or actually makes a report,
- Is mentioned in the report,
- Acts as a witness, or
- Otherwise assists with the investigation and resolution of the report,

from detrimental conduct, acts and omissions.

Examples of detrimental conduct, acts and omissions include but are not limited to:

- Dismissal of an employee.
- Alteration of an employee's position or duties to his or her disadvantage.
- Harassment or intimidation of a person.
- Harm or injury to a person, including psychological harm.
- Damage to a person's reputation.

Examples of actions that are NOT detrimental conduct and omissions include but are not limited to:

- Administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g. moving a whistleblower who has made a report about their immediate work area to another office to prevent them from detriment); and
- Managing a whistleblower's unsatisfactory work performance, if the action is in line with CatholicCare's [Managing Unsatisfactory Performance and Conduct Policy](#).

CatholicCare has in place the following measures and mechanisms to protect whistleblowers from detriment:

- Processes for assessing the risk of detriment against a whistleblower and other persons (e.g. other staff who might be suspected to have made a report), which will commence as soon as possible after receiving a report.
- Our Employee Assistance Program Access EAP 1800 81 87 28.
- Strategies to help a whistleblower minimise and manage stress, time or performance impacts, or other challenges resulting from the report or its investigation.
- Actions for protecting a whistleblower from risk of detriment—for example, we may allow the whistleblower to perform their duties from another location, reassign the whistleblower to another role at the same level, make other modifications to the whistleblower's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the reported matter.
- Processes for ensuring that management are aware of their responsibilities to maintain the confidentiality of a report, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a whistleblower.
- Procedures on how a whistleblower can lodge a complaint if they have suffered detriment, and the actions we may take in response to such complaints (e.g., the complaint may be investigated as a separate matter by an officer who is not involved in dealing with reports and the investigation findings will be provided to the Executive Director).
- Interventions for protecting a whistleblower if detriment has already occurred.

We will thoroughly investigate reports of detrimental acts. If proven, those who have victimised another will be subject to management action including disciplinary action up to dismissal. It is also an offence/contravention under the Act which carries serious penalties for individuals and companies. If you are a whistleblower of a reportable matter and you suffer detrimental acts, you may also be eligible to claim compensation and remedies under the Act.

Nothing in this policy is intended to change or take away any other protections which may be available at law.

Assessing and Controlling the Risk of Detriment

CatholicCare has established processes for assessing and controlling the risk of detriment and keeps records of its risk assessments and risk control plans. See [Risk Management Policy](#) and [Risk Management Practice Guidelines](#).

Additional Support

The whistleblower can contact the Executive Manager People & Culture to discuss how CatholicCare may be able to provide support and protection.

The Executive Manager People & Culture can:

- Assess the immediate welfare and protection needs of a whistleblower.
- Safeguard the interests of a whistleblower in accordance with this policy and the law.
- Address any issues or concerns of detrimental acts/detrimental treatment.

CatholicCare may appoint a person from within the organisation or a third party to be a Protection Officer.

What will CatholicCare do with the report?

The Whistleblower Officer has been appointed by CatholicCare to receive the report directly from you (if you make an internal disclosure to our organisation) or from "WBS" (if you make an external report to WBS).

The Whistleblower Officer will:

- Carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven.
- Keep the information provided in a confidential and secure system.
- Coordinate and oversee the investigation where an investigator has been appointed.
- Advise the Whistleblower (through "WBS" where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so.
- Take all reasonable steps to ensure fair treatment for and to ensure the identity of the Whistleblower and the person/s who is the subject of the report are kept confidential. An employee who is the subject of a report will be advised about the subject matter of the report as and when required by principles of natural justice and procedural fairness and prior to any actions being taken. An employee who is the subject of a report may contact the CatholicCare's Access EAP Support Services 1800 81 87 28.

If an allegation of serious wrongdoing is made by staff classified as a public official and it is a voluntary public interest disclosure which is related to or associated with an agency, then CatholicCare are also required to notify the relevant agency.

Investigation of the report

The Whistleblower Officer will carefully assess and use the information provided in the report to decide the best action to take, including whether an investigation is required and, if so, determine the appropriate investigation process, including:

- The nature and scope of the investigation.
- Who will conduct the investigation and whether that person should be external to our organisation.
- The nature of any technical, financial or legal advice that may be required.
- A timeframe for the investigation (having regard to the level of risk).

How will the investigation be conducted?

The investigation will be conducted in a constructive, impartial and lawful way according to the principles of natural justice and procedural fairness and all efforts will be made to meet investigation best practices.

The Investigator will:

- Gather information, material and documentation concerning the report as quickly as possible. (This may involve taking steps to protect or preserve documents, materials and equipment.)
- Focus on the substance of the report and will not focus on the motives of the whistleblower.
- Not assume that reports about conduct or behaviour that appear to have had a personal impact on a whistleblower are somehow less serious. The whistleblower's experience may indicate a larger or systemic issue.
- Take a statement or record of interview and or tape formal interviews with witnesses as required (Where the whistleblower wishes to remain anonymous and does not wish to make a statement they will not be asked to do so.)
- Keep information gathered in the investigation securely.
- Take all reasonable steps to protect the identity of the whistleblower. Where disclosure of the identity of the whistleblower cannot be avoided due to the nature of the allegations, the investigator will first gain the consent of the whistleblower before providing identifying information to any additional persons.
- Complete the investigation and provide a report of their findings as soon as is reasonably practical.

Investigator's Report

At the conclusion of the investigation, the investigator will provide a written report to the Executive Director who is appointed as Decision Maker including:

- A finding of all relevant facts.
- Whether the report is proven, not proven or otherwise.
- Recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings.

CatholicCare will use the report to determine the action (if any) to be taken including disciplinary action.

The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

Will the whistleblower be kept informed?

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of:

- When the investigation process has begun.
- Relevant progress of the investigation.
- The outcome of the investigation; to the extent that it is legally permissible and appropriate to do so.

What happens if the misconduct is proven?

If the misconduct is proven CatholicCare will decide what action to take including disciplinary action up to dismissal. The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

Avenues for Review

A whistleblower may request a review of the investigation findings if the whistleblower is not satisfied with the outcome. The review will be conducted by an officer who is not involved in handling and investigating disclosures and the review findings will be shared with the Executive Director or audit and risk committee.

CatholicCare is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

What are the consequences of making a false report?

CatholicCare reserves the right to take disciplinary action against individuals who knowingly make false or malicious reports. This does not apply to reports made in good faith that turn out to be unfounded.

Anyone who makes a report knowing it to be false or misleading may be subject to disciplinary action, including dismissal. The disciplinary action will depend on the severity, nature and circumstance of the false report.

CatholicCare however, does not wish to deter staff from making reports. In cases where whistleblowers have some information leading to a suspicion, but not all the details, staff are encouraged to speak up and report the misconduct and will not face disciplinary action in those circumstances.

How will this policy be made available to staff?

CatholicCare will make the policy available to staff and will provide training on the whistleblower policy, including how to report concerns and their rights and protections under this policy.

- Holding staff briefing sessions and/or smaller team meetings.
- Posting the policy on IsidoreNet.
- Posting information on staff noticeboards.
- Incorporating the policy in employee induction information packs and training for new starters.

Training & Education

CatholicCare HR team will be responsible for conducting upfront and ongoing education and training on the Whistleblower Policy and procedures to all staff.

Related documents

Agency policies

- [Code of Conduct & Ethics Framework](#)
- [Care & Respect at Work Preventing Bullying Harassment & Discrimination Policy](#)
- [Complaints and Feedback Policy](#)
- [Fraud Prevention Policy](#)
- [Incident Management Policy](#)
- [Managing Unsatisfactory Performance and Misconduct Policy](#)
- [Public Interest Disclosure Policy](#)
- [Resolving Workplace Issues \(Staff Grievance\) Policy](#)
- [Risk Management Policy](#)
- [Work Health & Safety Policy](#)

Agency practice guidelines

- [Managing Complaints Practice Guidelines](#)
- [Managing Incidents Practice Guidelines](#)
- [Resolving Workplace Issues \(Staff Grievance\) Practice Guidelines](#)
- [Risk Assessment for Staff during Safeguarding Investigations Practice Guidelines](#)
- [Risk Management Practice Guidelines](#)
- [Workplace Investigations Practice Guidelines](#)

External public interest disclosure policies

- [DCJ Public Interest Disclosure Policy](#)
- [NSW Health Public Interest Disclosure Policy](#)
- [Attorney General Public Interest Disclosure Policy](#)
- [NSW Department of Education Public Interest Disclosures](#)
- [NSW Department of Customer Service Public Interest Disclosure Policy \(Fair Trading\)](#)

External resources

- [ASIC \(Australian Securities & Investments Commission\)](#)
- [ASIC Regulatory Guide RG 270 Whistleblower policies](#)
- [Corporations Act 2001](#)
- [Fair Work Ombudsman](#)
- [Public Interest Disclosure Act 2022 \(NSW\)](#)
- [WBS: Whistleblowing Report Service - CatholicCare Page](#)
- [WBS: Whistleblowing Service – Make a Report](#)

Glossary

Whistleblower

Whistleblower means a person who makes a report under this Policy.

Sign off and review

Version	Authorised by	Approved date	Review cycle	Review due
1.0	Culture & Capability Manager	9 November 2020	2 years	November 2022
2.0	Executive Manager People & Culture	22 November 2022	2 years	November 2024
3.0	Executive Manager People & Culture	26 November 2024	Review date adjusted to align with new review schedule	April 2025

Revision history

Version	Description	Author	Amendment date
1.0	Policy	Policy Specialist	4 November 2020
1.1	Policy	Policy Specialist	18 November 2020
1.2	Policy	Policy Specialist	22 March 2021
1.3	Policy	Policy Specialist	7 September 2021
2.0	Policy	HR Advisor	22 November 2022
2.1	Policy	Policy Specialist	13 February 2023
2.2	Policy	HR Advisor	19 June 2023
2.3	Policy	HR Advisor/Policy Specialist	18 July 2023
2.4	Policy	Policy & Document Support Officer	20 December 2023
3.0	Policy	Policy Specialist/Executive Manager Quality Safeguarding Risk and Compliance	20 November 2024