

## **ANZATS Whistleblowing Policy**

### Section 1: Our Purpose

#### 1.1 Our Goals and Commitment

The vision of the Australian and New Zealand Association of Theological Schools (ANZATS) Limited is to promote vibrant theological education and mature reflection among institutional and individual members in Australia and New Zealand.

To achieve our vision, it is crucial that all of our employees, directors and officers, and members understand, follow, and adhere to our corporate values which are:

- Inclusion of all who participate in the annual ANZATS Conference and other ANZATS-convened fora regardless of theological or religious point of view;
- With respect to the Conference and other fora, organisation of the highest standards in the interests of providing a respectful and stimulating interaction among scholars, researchers and other participants;
- Respectful interaction between members and the employees, and the directors and officers of ANZATS;
- Highest standards of probity with regard to ANZATS finances and clear and timely disclosure to members of financial statements;
- With respect to its journal, Colloquium, adherence to the highest standards of production and peer review of articles.

Consistent with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee, director and officer, and member should have the chance to speak up anonymously when they feel we are not adhering to our corporate values. They should have: a place to report misconduct, confidence that every report will be heard and acted on, and that we will make improvements to our corporate culture based on the findings of independent investigations into each report.

- ANZATS believes everyone should be able to make reports anonymously. We commit to protecting informants' identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and, where appropriate, provide feedback to the whistleblower.

## 1.2 Our Commitment

ANZATS wants our employees, directors and officers, and members to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. ANZATS also wants to let them know about their right to be anonymous as well as how we, as an organisation, will ensure they are not subject to any retaliation or other abuse as a result of making a report.

## 1.3 What Conduct Should Be Reported?

It is important that ANZATS outlines what behaviour we want to be reported under this policy. We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent;
- Illegal;
- Corrupt;
- Dishonest;
- Unethical;
- A violation of the law or any legal code within the jurisdictions in which ANZATS operates;
- Creating an unsafe environment;
- A breach of any of our company's policies;
- Discriminatory;
- Harassment and/or bullying of any kind;
- Any conduct which is detrimental to ANZATS and could cause financial or non-financial loss.

Any allegation of illegal activity will be referred to the appropriate authorities by the person to whom the allegations were made while preserving the anonymity of the whistleblower.

## 1.4 Scope Of This Policy

The following would be considered "eligible persons" and would fall under ANZATS' Whistleblowing Policy.

- Employees;
- Directors and officers;
- Members;
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees, directors and officers, and members.

This policy applies to all ANZATS' activities. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

## Section 2: Process for Making a Report

### 2.1 What Options Do “Eligible Persons” Have for Making a Report?

If an eligible person would like to make a report, they have the following channels available to them.

- Anonymous email to the Executive Officer as day-to-day manager of ANZATS' Whistleblowing Policy ([secretary@anzats.edu.au](mailto:secretary@anzats.edu.au)) or to the President and Chair of the Council ([president@anzats.edu.au](mailto:president@anzats.edu.au)). If the report concerns the day-to-day manager, the President of ANZATS will assume the responsibilities and functions of the day-to-day manager;
- Via phone to the day-to-day manager (Executive Officer: 0434 632 815 or 02 9712 7448);
- Via post to the day-to-day manager (Executive Officer: PO Box 3614, Wareemba NSW 2046, Australia);
- Speak with a director or officer of ANZATS (contact details on ANZATS website).

### 2.2 You Can Remain Anonymous

ANZATS respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting only with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice. At no point do you need to do so, nor will you be required to provide your identity unless ANZATS is compelled to do so by law. If you decide to disclose your identity, ANZATS will work to protect your identity and will outline and document who in the organisation will know you submitted your report. ANZATS will also take all steps necessary (as outlined in this policy) to ensure you do not suffer any retaliation. It is worth noting that, while ANZATS will make every endeavour possible to investigate your report, there may be limitations to what can be achieved if the informant decides to remain anonymous.

### 2.3 What Is the Investigative Process?

It is important for ANZATS to be transparent with our employees and officers, and outline what the process is for investigating a report submitted through our whistleblowing channels. Below, we have provided the different steps a case manager or member of our whistleblowing team will go through once a report is received until the case is closed.

1. A report (anonymous or otherwise) is received through one of the channels specified in 2.1 above and is referred to the day-to-day manager, noting that if the report concerns the Executive Officer the President of ANZATS will act as the day-to-day manager.



2. The day-to-day manager assigns a case manager to the report. The case manager will manage the investigation.



3. The case manager confirms receipt of the report, conducts an initial assessment to confirm it is a valid report and requests permission to investigate.



4. The case manager begins their investigation. This can include corresponding with the informant if there is a channel to do this.



5. The case manager investigates and updates management, and the informant, as per policy guidelines.



6. Once the case manager has finalised their investigation and report, management and the informant are updated.



7. At this point, the case manager hands all relevant documentation over to management for any subsequent action to take place.

## 2.4 How We Use Third Parties

At ANZATS, we utilise third parties in our whistleblowing program and strategy:

- **Whistleblowing Protection Officer:**  
The directors of ANZATS Limited have appointed Prof Michael Horsburgh as its Whistleblowing Protection Officer for the three years 2020-2022 to ensure we protect informants' identities and leverage technologies to ensure no one in our organisation can identify them.
- If necessary, the directors of ANZATS Limited will use a third party accounting firm to undertake a forensic investigation of allegations of financial misconduct that come through our whistleblowing program.
- If necessary, the directors of ANZATS Limited will use a third party investigative firm to investigate specific cases where we do not have the skills needed in-house. They are also used for investigations that we would prefer a third party execute on due to the nature of the report.
- If necessary, the directors of ANZATS Limited will utilise human resources consultants in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

## 2.5 Who Is Alerted to a Report?

Employers and directors and officers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner.

## 2.6 What Is the Process of Updating the Informant?

As part of our investigative process, ANZATS will update the informant on the progress of the investigation. These updates can include the following:

- ANZATS has confirmed the receipt of a report from the informant.
- ANZATS has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

ANZATS' commitment is that the informant will be updated once a month while the investigation is ongoing. They will then be updated once the investigation has been closed. ANZATS will strive to provide as much feedback on the investigation as possible.

## 2.7 What If the Informant Is Not Satisfied With the Result?

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the ANZATS' Whistleblowing Protection Officer. The informant can provide this escalation in writing so that a formal review can take place. If the WPO concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

## Section 3: How Informants Are Protected

### 3.1 Anonymity After Submitting a Report

Section 2.2 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- ANZATS is committed to protecting an informant's identity during and after submitting a report.
- At no time will ANZATS force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals their identity, the day-to-day manager will document who will have access to their identity. This can include the case manager and the whistleblowing program owner.

### 3.2 Potential Retaliation

An informant might be concerned that ANZATS employees, directors and officers and members might retaliate against them. In this case, ANZATS will protect the informant from:

- Having their employment ceased;
- Performance management;

- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report.

### 3.3 Considered Risk of Retaliation

In the case of “considered risk of retaliation”, the informant believes retaliation is near or imminent and that they are targeted for retaliation. In cases where there is risk of retaliation, the informant should contact ANZATS’ Whistleblowing Protection Officer who take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

### 3.4 Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the ANZATS’ Whistleblowing Protection Officer who will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved.

### 3.5 Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately they can escalate this case in writing. The report will need to go to the WPO and they will investigate the matter and process for how the retaliation was dealt with.

### 3.6 How ANZATS Deals With Retaliation

ANZATS does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person found retaliating will face disciplinary action, including the possibility of being terminated from their roles.

### 3.7 Separation of Issues

ANZATS will be able to still raise any issues related to work or performance. While ANZATS will protect the informant from any retaliation, it is also important that they are still effective in their job. ANZATS can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

### 3.8 Protection and Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

### 3. 9 Legislative/Regulation Protection and Assistance

If any jurisdictions or locale where ANZATS operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

## Section 4: Our Roles and Responsibilities

### 4.1 Roles

The roles within ANZATS' whistleblowing program include the following:

- Executive Officer as day-to-day manager.
- President of ANZATS (who will act as day-to-day manager if a report concerns the Executive Officer).
- Directors of ANZATS Limited.
- Whistleblowing Protection Officer.
- Case Managers investigating individual reports.
- Any third party (noted in section 2.4) investigating reports.

### 4.2 Responsibilities

The following are the responsibilities of each role in ANZATS' whistleblowing program.

- Executive Officer as the day-to-day manager:  
The day-to-day manager views incoming anonymous reports, assigns these reports to case managers, and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.
- President of ANZATS:  
If a report concerns the Executive Officer, the President of ANZATS assumes the role of day-to-day manager. See section 2.1.
- Whistleblowing Protection Officer:  
This person owns the entire program and is measured on its overall success. This includes employees, and directors and officers knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place. While this person reports into the organisation, the results of their work goes directly to the ANZATS Council.
- Case Managers investigating individual reports:  
Case managers are assigned anonymous reports and their role is to investigate these reports. This includes interacting and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.
- Any third party (noted in section 2.4):  
The whistleblowing program leverages the expertise and acumen of third parties to ensure ANZATS is using best practices during investigations and is treating all employees, and directors and officers fairly.

## Section 5: Governance

### 5.1 Changes to ANZATS' Whistleblowing Policy

From time to time, ANZATS' whistleblowing policy will need to change to keep up with its values, best practices, improvements, as well as legislation and regulations. Any changes to our whistleblowing policy will be communicated to all employees and any relevant stakeholders. This policy and any changes made will form any contract of employment.

All changes to the Policy will be approved by the Board of Directors. The Board can comment and provide feedback as necessary. All changes will also be documented in ANZATS' whistleblowing policy and will be made available to all employees.

The initial ANZATS' Whistleblowing Policy and all subsequent changes must be endorsed by the Whistleblowing Protection Officer.

### 5.2 Reporting to the Board of Directors

The Board of Directors is updated every quarter on ANZATS' whistleblowing program, inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Board of Directors outside of the quarterly updates. The Board of Directors at any time can ask about anonymous reports, investigations, as well as the state of ANZATS' whistleblowing program, though they will have no access to the identity of a whistleblower who wishes to remain anonymous. The Board is responsible and accountable for the implementation and effectiveness of ANZATS' whistleblowing program.

### 5.3 Policy Review Date

The Board of Directors will review the Policy by the end of 2022.

## Appendix 1: Policy Change Log

Action	Date
Initially approved by Board	16 December 2019
Endorsed by the Whistleblowing Protection Officer	16 December 2019

## Appendix 2: All Relevant Local Legislation/Regulation

In Australia:

<https://www.legislation.gov.au/Details/C2019A00010>

In New Zealand:

[http://www.legislation.govt.nz/act/public/2000/0007/latest/DLM53466.html?search=ts\\_act%40bill%40regulation%40deemedreg\\_protected+disclosures+act\\_resel\\_25\\_h&p=1](http://www.legislation.govt.nz/act/public/2000/0007/latest/DLM53466.html?search=ts_act%40bill%40regulation%40deemedreg_protected+disclosures+act_resel_25_h&p=1)

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