

ECEC Policy 35

Protected Disclosures

Approval
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Controlled Document

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Document Owner:	Manager – Early Childhood Education & Care		Approved by:	Executive Manager – Children & Youth Services	
Reviewed by:	Project Officer – Early Childhood Education & Care				

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1. Purpose

CatholicCare Wollongong, as the approved provider of the education and care service, is committed to ensuring the safety, health and wellbeing of children in our care. We provide a safe and confidential process for reporting wrongdoing, misconduct, or any matter that may put the safety, welfare or wellbeing of a child or children at risk within our service.

We are committed to supporting and building a culture of integrity and accountability by encouraging the reporting of wrongdoing or suspected wrongdoing. We will ensure that anyone making a report can do so without fear of detrimental action.

The integrity of our service relies upon service leaders, educators, staff, volunteers, contractors and subcontractors, as well as parents and carers speaking up when they become aware of wrongdoing.

We will not tolerate or condone the taking of any negative action or detrimental action against anyone who intends to disclose or has disclosed wrongdoing.

This policy sets out:

- how CatholicCare Wollongong will deal with protected disclosures made under the Children (Education and Care Services) National Law (NSW) (the National Law)
- who to contact if you want to make a report
- how to make a report

- the protections available to you when you make a protected disclosure under the National Law.

This Protected Disclosures Policy has been developed in accordance with section 300E of the Children (Education and Care Services) National Law (NSW) and the NSW Early Learning Commission Model Protected Disclosures Policy.

This policy operates alongside the CatholicCare Whistleblower Policy, which sets out CatholicCare's overarching framework for managing disclosures of misconduct across all service streams. Where appropriate, disclosures may be managed in accordance with both policies to ensure child safety, legal compliance and organisational integrity.

2. Application

This policy applies to all current and former employees, volunteers, individuals who supply services or exercise functions on behalf of CatholicCare Wollongong (including a contractor or subcontractor), work experience students, parents and/or carers.

When CatholicCare Wollongong (Early Childhood and School Aged Education and Care Services) receives a protected disclosure, we have obligations including with respect to:

- protecting the maker of the protected disclosure, and
- dealing with the protected disclosure.

Where a disclosure relates to alleged child abuse, reportable conduct, or serious misconduct, mandatory reporting and escalation requirements under CatholicCare's Child Safeguarding Disciplinary and Misconduct (Reportable Conduct) Policy apply in addition to this policy.

For clarity, internal workforce disclosures may also be managed through CatholicCare's People & Culture and executive reporting pathways, in accordance with the CatholicCare Whistleblower Policy.

3. Paramourncy and Decision Making

In all decision making relating to protected disclosures, the safety, rights and best interests of children are paramount.

Where there is any conflict between organisational, individual or operational considerations, decisions will be guided by child safety obligations under the National Law and CatholicCare Wollongong's child safeguarding commitments.

Where a protected disclosure raises child safety concerns, CatholicCare Wollongong will ensure that mandatory reporting and reportable conduct obligations are met, while maintaining confidentiality, procedural fairness and appropriate governance oversight.

4. Terms and definitions

Table 1. Terms and definitions

Term	Definition
Detriment	<p>To a person, means disadvantage to the person including the following-</p> <ul style="list-style-type: none"> • injury, damage or loss caused to the person; • damage caused to the person's property; • damage caused to the person's reputation; • intimidation, bullying, or harassment; • unfavourable treatment in relation to the person's career, profession, employment or trade; • discrimination, prejudice or adverse treatment, whether in relation to employment or otherwise; • disciplinary proceedings or disciplinary action
Manager	<p>of an approved provider or approved education and care service, means a person, however described, who is responsible for controlling or administering either of the following—</p> <p>the approved provider or approved education and care service;</p> <p>the staff of the approved provider or approved education and care service</p>
Protected disclosure	<p>means a disclosure of information or provision of documents—</p> <p>1 (a) to the Regulatory Authority in compliance with a request under, or otherwise in accordance with, this Law; or</p> <p>to the Regulatory Authority or to a manager of an approved provider or approved education and care service, if the person making the disclosure honestly, and on reasonable grounds, believes the disclosure shows or tends to show—</p> <p>an offence against this Law has been or is being committed; or</p> <p>the safety, health or wellbeing of a child or children being educated and cared for by an education and care service is at risk.</p> <p>(2) A disclosure is not a protected disclosure if the information disclosed or documents provided—</p> <p>(a) relate only to a grievance about a matter relating to the employment or former employment of an individual; and</p> <p>(b) do not have significant implications beyond matters personally affecting or tending to personally affecting or tending to personally affect the individual.</p> <p>However, subsection (2) does not apply if the grievance arises from-</p> <p>(a) a decision made by an approved provider or approved education care service in dealing with a previous protected disclosure; or</p>

	(b) alleged detrimental action relating to a previous protected disclosure.
Serious detrimental action	<p>Serious detrimental action against a person means an act or omission causing, comprising, involving or encouraging- detriment to the person; or the threat of detriment to the person, whether express or implied.</p> <p>The Following actions are not serious detrimental action-</p> <ul style="list-style-type: none"> • lawful action taken by a person or a body to investigate a possible contravention of the National Law • prosecuting a person for a criminal offence; • referring a matter about a person to the independent arbiter; • making a disciplinary agreement or disciplinary order in relation to a person; • giving a disciplinary notice to a person.

5. What is a protected disclosure?

This policy applies to protected disclosures under the National Law.

A protected disclosure means a disclosure of information or provision of documents -

- a) to the NSW Early Learning Commission in compliance with a request under, or in accordance with the National Law, or
- b) to the NSW Early Learning Commission or to a manager of an approved provider of an approved education and care service, if the person is making the disclosure honestly, and on reasonable grounds, believes the disclosure shows or tends to show -
 - (i) an offence against the National Law has been or is being committed; or
 - (ii) the safety, health or wellbeing of a child or children being educated and cared for by an education and care service is at risk.

Examples of a protected disclosure may include:

- conduct that endangers or may endanger the safety, health or wellbeing of children
- unsafe work practices
- illegal activity or a breach of the law
- inappropriate conduct towards children
- inappropriate discipline of a child
- breach of child protection requirements
- failure to comply with the National Law or Regulations.
- taking or threatening to take detrimental action against a person who has made a

disclosure, is suspected to have made or is planning to make a disclosure.

6. What is not a protected disclosure?

We encourage everyone to speak up about concerns. However, this policy does not apply to disclosures or concerns that relate only to a personal employment grievance or complaint, that does not have significant implications beyond the individual concerned.

A matter may still be considered a protected disclosure if it arises from a decision made by an approved provider or approved education and care service in dealing with a previous protected disclosure; or alleged detrimental action relating to a previous protected disclosure.

Examples of concerns that are not generally considered a protected disclosure include:

- performance concerns
- employment related decisions that do not involve a breach of workplace laws
- concerns relating to engagement, remuneration or promotion
- interpersonal conflict between employees
- disciplinary actions, including suspension or termination that are unrelated to a protected disclosure.

Personal work-related grievances that do not relate to child safety, reportable conduct or detrimental action will not be managed under this policy. These matters will be managed in accordance with CatholicCare Wollongong's Managing Workplace Complaints Policy (WS 1.3) and relevant People & Culture procedures.

7. Reporting

7.1 Making a report

7.1.1 Within CatholicCare Wollongong

If you become aware of a matter, you should report it as soon as practicable. You can make a report to line managers, an Executive Manager including the Executive Manager, People & Culture, Chief Operating Officer (COO) or Chief Executive Officer (CEO).

While reports may be received at service level, CatholicCare Wollongong, as the Approved Provider, is responsible for assessing and managing protected disclosures, including determining the appropriate response, investigation, escalation and any mandatory or reportable conduct obligations.

The manager of an approved provider or the education and care service, means a person who is responsible for controlling or administering either of the following-

- (a) the approved provider or approved education and care service;
- (b) the staff of the approved provider or approved education and care service.

Where it is determined that a concern raised is more appropriately managed as a workplace complaint rather than a protected disclosure, CatholicCare Wollongong will refer the matter to the appropriate process, including the Managing Workplace Complaints Policy (WS 1.3).

7.1.2 The NSW Early Learning Commission

If you do not feel comfortable making a report within your education and care service you can make also report to the NSW Early Learning Commission as the regulatory authority in NSW.

If you wish to make a report to the NSW Early Learning Commission, you can do so by calling 1800 619 113 or by email: information@earlylearningcommission.nsw.gov.au. You can do so anonymously if you wish.

7.2 Disclosure to be made honestly, and on reasonable grounds

To obtain protections under the National Law, a report must be made honestly and on reasonable grounds. The person making the report must honestly believe, on reasonable grounds, that the disclosure shows or tends to show that an offence has been or is being committed under the National Law, or that the safety, health or wellbeing of a child or children being education and cared for by an education and care service is at risk.

A person will have reasonable grounds if there is a factual basis for the belief, taking in to account the circumstances and context.

You are not required to prove the allegations or concern. However, you are encouraged to provide any evidence, including documentation, to support the report.

If a report turns out to be incorrect or unsubstantiated, the reporter can still qualify for the protections under the National Law provided it was made honestly and on reasonable grounds.

7.3 How can I make a protected disclosure?

You can make a report in a number of ways:

- In writing- by email or letter to a person who can receive your report.
- Through a discussion- have a private discussion with a person who can receive your report. This could be done face to face, via telephone or virtually.
- Anonymously- write an email or letter or call a person who can receive your report without providing your name or any details that might identify you as the maker of the report. A report can only be considered anonymous if there is no reasonable or practical way of communicating with the person making the report.

You will still be protected under the National Law if you chose to remain anonymous. However, it may be difficult to investigate the matter if you cannot be contacted for further information.

7.4 What should I include in my report?

When you make your report, you should provide as much information as possible as that will assist us to deal with the report effectively. You should include:

- any relevant dates, times and location of key events
- any names of person(s) involved in the suspected wrongdoing, their role, title and how they are involved.
- your description of the matter you are disclosing
- possible witnesses to what you are disclosing, and
- other information (including documents) you have that supports your report.

7.5 What if I am not sure if my report is a protected disclosure?

You should report all wrongdoing that you become aware of, even if you are not sure whether it qualifies as a protected disclosure. Reporting plays a crucial role in managing risk and ensuring the safety and integrity of our service.

It is important for CatholicCare Wollongong to understand what may be occurring as this helps uncover potential wrongdoing including misconduct.

Once a report is made, CatholicCare Wollongong is responsible for handing it appropriately and in accordance with our obligations under the National Law. If the report does not qualify as a protected disclosure, it may be managed under other internal policies such as our procedures for dealing with reports, allegations or complaints.

8. Protections and remedies for reporters

8.1 Protection from detrimental action

When you make a protected disclosure, you are entitled to protections under the National Law.

We are committed to taking all reasonable steps to protect you from detriment as a result of making a protected disclosure or being suspected of making a protected disclosure. We are also committed to maintaining your confidentiality as much as possible while the protected disclosure is being dealt with. We will not tolerate any type of detrimental action in response to a protected disclosure.

Detriment may include:

- injury, damage or loss
- damage caused to property
- damage to reputation
- intimidation, bullying or harassment
- unfavourable treatment in relation to employment, career or profession discrimination, prejudice, or adverse treatment
- disciplinary action or proceedings

8.2 Preventing harmful actions

A person must not take detrimental action against another person because they know, suspect or believe that the person has made or is considering making a protected disclosure and that belief is a contributing factor to the detrimental action. Detrimental action includes bullying, harassment, intimidation or disciplinary action.

Once we become aware that a protected disclosure has been made, we will undertake a risk assessment and take steps to reduce the risk of detrimental action occurring.

Taking serious detrimental action in response to a protected disclosure is a criminal offence under the National Law. The penalties that apply include:

- for an individual- \$34,200
- for a large childcare provider- \$51,600
- otherwise- \$172,200.

It is not a defence to a prosecution for a detrimental action offence that the suspicion or belief was mistaken.

A person accused of taking detrimental action must demonstrate the action was not influenced by any suspicion, belief or awareness that a protected disclosure had been or may be made.

A person who makes a protected disclosure may still be subject to reasonable management action, such as ordinary performance reviews or performance management, provided this action is not taken because of the protected disclosure.

8.3 Recovery of damages

A person may seek damages for injury, damage or loss suffered as a result of serious detrimental action. Liability for these damages is not affected by whether the suspicion or belief behind the action was mistaken. In proceedings to recover damages, the defendant must prove that they did not have the suspicion, belief or awareness, or that it was not a contributing factor to the detrimental action. Damages may include exemplary (punitive) damages. A person can apply for damages even if no criminal prosecution has been brought, or if the person has been acquitted of a serious detrimental action offence on the same, or substantially similar facts.

8.4 Ability to seek an injunction

A person who believes serious detrimental action has been taken against them or may be taken against them can apply to the Supreme Court for an injunction to prevent the action or stop it from continuing.

An injunction may:

- restrain a person from engaging in behaviour that would constitute serious detrimental action
- require a person to do a thing or an act to remedy the conduct that constitutes serious detrimental action.

Examples of what an injunction may include:

- requiring a formal apology to be made
- preventing an attempt to terminate a person's employment

- reinstating a person to the same or substantially similar role.

The Supreme Court may grant an interim injunction pending determination of the application. A person can apply for an injunction even if no prosecution has been brought, or if the person has been acquitted of a serious detrimental action offence on the same, or substantially similar facts.

8.5 Immunity from costs orders

A person who makes an application for damages under the National Law, will not be liable to pay costs incurred by another party to the proceedings unless:

- the person instituted the proceedings vexatiously or without reasonable cause, or
- the person's unreasonable act or omission caused the other party to incur the costs.

A person who applies for an injunction under the National Law will not be liable to pay the other party's legal costs, unless:

- the proceedings were brought vexatiously or without reasonable cause, or
- the person's unreasonable act or omission caused the other party to incur the costs.

8.6 Immunity from civil and criminal liability

Some people are subject to a duty of confidentiality that prevents them from disclosing certain information obtained at work. To make a protected disclosure, it may be necessary to override or disregard these confidentiality duties. In such cases, a person who makes a protected disclosure cannot be disciplined, sued or criminally charged for breaching confidentiality. This protection does not cover liability for the person's own past conduct that is disclosed as part of the protected disclosure.

A person making a protected disclosure may have a defence of absolute privilege under the Defamation Act 2005 in relation to defamation proceedings arising from the disclosure.

8.7 Confidentiality

We are committed to maintaining the confidentiality of anyone who makes a protected disclosure as far as possible while the matter is being addressed. All information received from a person making a protected disclosure will be treated sensitively and confidentially.

See Section 10.2 dealing with protecting the confidentiality of the maker of a protected disclosure.

9. Reporting detrimental action

If you experience detrimental action as a result of your report, including bullying, intimidation, harassment, or other adverse treatment, you should report this immediately. Reports can be made directly to the line Managers, Executive Managers, People and Culture team, COO or CEO of CatholicCare Wollongong, External reports can also be made to Early Childhood and School Aged Education and Care or to the NSW Early Learning Commission.

10. How we will deal with your protected disclosure

10.1 Communicating with the maker of the protected disclosure

After receiving a report, we will assess the information to determine whether it is a protected disclosure, how it is to be handled, and whether an investigation is required.

The person who made the report will receive an acknowledgment that the report has been received.

This acknowledgement will:

- Confirm the report will be assessed to identify whether it qualifies as a protected disclosure
- Advise that the National Law applies to how the report is managed
- provide clear information on how to access this protected disclosure policy
- include details of a contact person and available support options.

10.1.1 Report is a protected disclosure

If the report is determined to be a protected disclosure, we will inform the person who made it how we intend to manage the report. This will happen as soon as possible after the report has been assessed.

Ways we may deal with a protected disclosure include:

- investigating the wrongdoing internally
- referring the report to a third party such as the NSW Early Learning Commission or other relevant agency. Depending on the circumstances, we may provide the person who made the disclosure with details of the referral.
- deciding to take no action on the report (i.e. not investigate it or refer it). If this occurs, we will explain the reasons for this decision to the person who made the disclosure.

If we investigate the wrongdoing, we will provide updates to the person making the protected disclosure at key stages including:

- when the investigation begins
- while the investigation is in progress
- when the investigation has been finalised.

Once the investigation is complete, we may provide the person who made the disclosure with additional information. Subject to privacy and confidentiality requirements this information may include:

- A summary of the investigation results, including whether any wrongdoing was found
- Information about any action taken as a result of the investigation.

Some details of the findings or actions may need to remain confidential to comply with legal obligations. We will always balance the right of a person making the disclosure to know the outcome with our other

legal obligations. If a disclosure was made anonymously, it may not be possible to provide updates or outcomes to the reporter.

10.1.2 Report not a protected disclosure

Not all reports of wrongdoing will be protected disclosures under the National law. If we assess that a report is not a protected disclosure, we will inform the person who made the report.

Even if a report is not a protected disclosure, we will still need to assess the concern and determine whether it should be handled under another process or pathway, such as through our internal complaints or grievances procedures. If another process applies, the report will be managed according to the relevant policies.

10.2 Protecting the confidentiality of the maker of a public disclosure

We understand that people who make a protected disclosure may wish their identity, and the fact that they have made a report to remain confidential. We are committed to maintaining confidentiality as far as possible while the protected disclosure is being managed.

The identity of a person making a protected disclosure will be kept confidential unless any of the following apply:

- They consent to this information being disclosed
- Where it is generally known that the person is the maker of the protected disclosure because of their voluntary self-identification as the maker
- Where the person who has received the protected disclosure reasonably considers it necessary to disclose the information to protect a person from detriment
- It is reasonably necessary to disclose the information during an investigation to ensure procedural fairness. In these cases, all reasonable steps will be taken to protect their identity
- CatholicCare Wollongong is required or permitted to disclose this by law
- It is otherwise in the public interest to disclose the identifying information

We will take practical steps to avoid unnecessarily revealing information that could identify the person making the protected disclosure. Ways we may do this include:

- limiting access to information to authorised personnel only;
- using de-identified information where possible;
- securely storing records and communications; and
- carefully managing communications during any assessment, investigation or escalation process.

If confidentiality cannot be maintained or is unlikely to be maintained, CatholicCare Wollongong will:

- inform the person making the protected disclosure of this outcome; and
- take reasonable steps to minimise the risk of detriment or adverse treatment to the person.

10.3 How we will assess and minimise the risk of serious detrimental action

Once we become aware of a protected disclosure, we will assess and take steps to minimise the risk of serious detrimental action, other than reasonable management action, being taken against someone as a result of the disclosure. There is no obligation on a person who receives a protected disclosure to disclose or confirm that a protected disclosure has been made. Wherever practicable, we will take steps to avoid the need to identify the nature of the source of the concern to maintain the confidentiality of the maker of the protected disclosure.

In circumstances where it is necessary or appropriate to refer to a protected disclosure being received, we will make appropriate redactions, use gender neutral terms and avoid the inclusion of contextual information which could identify the maker of the disclosure.

Where appropriate, we will consider the risks to:

- The person who made the protected disclosure
- The person who is subject of the protected disclosure
- Investigators
- Witnesses.

Where appropriate, we will:

- Consult with these individuals any concerns they may have
- Identify and implement strategies to reduce the risk of detrimental action
- Provide a secure and confidential way for them to communicate with CatholicCare Wollongong
- Offer access to a support person or other available supports.

10.4 Dealing with allegations of detrimental action

If CatholicCare Wollongong becomes aware of an allegation that a detrimental action has occurred or may occur, we will take all reasonable steps to address the action and protect those affected.

This may include:

- Taking immediate action to stop or prevent the detrimental action
- Implementing measures to protect the person or persons affected
- Taking appropriate disciplinary action against anyone that has taken detrimental action
- Referring any evidence of detrimental action to the NSW Early Learning Commission.

10.5 Dealing with wrongdoing

If, after an investigation, it is found that there was wrongdoing or other misconduct has occurred, CatholicCare Wollongong will take the most appropriate action to address the wrongdoing or misconduct.

This may include:

- disciplinary action in accordance with CatholicCare Wollongong's disciplinary and misconduct policies
- referral of the matter under the Child Safeguarding Disciplinary and Misconduct (Reportable Conduct) Policy, where relevant
- notification to statutory authorities, regulators or professional bodies, where required by law
- risk management actions to ensure the ongoing safety, health and wellbeing of children
- review and improvement of policies, procedures, systems or practices to prevent reoccurrence
- additional training, supervision or support for staff or the service, where appropriate

Any action taken will be proportionate to the nature and severity of the wrongdoing and will be managed in accordance with relevant legislation, organisational policies and procedural fairness principles.

11. Roles and Responsibilities

Certain people within CatholicCare Wollongong have responsibilities in relation to protected disclosures.

11.1 The Approved Provider/Nominated Supervisor/will:

- Ensure that obligations under the National Law and National Regulations are met, with child safety and wellbeing prioritised at all times
- Foster a workplace culture where reporting is encouraged and integrity is promoted within the service.
- Ensure there are systems in place for receiving disclosures
- Ensure managers understand their responsibilities in relation to protected disclosures
- Ensure protected disclosures are handled in accordance with the National Law and this policy.
- Ensure educators, staff, students and volunteers are aware of and comply with this policy and know how to access it.
- Ensure regular training and awareness sessions are provided about the importance of persons making protected disclosures and the protections available to persons making protected disclosures.
- Ensure risk assessments are conducted as soon as a report is received to identify and manage any potential harm.

11.2 Managers will:

- Ensure obligations under the National Law and National Regulations are met with child

safety and wellbeing are prioritised at all times

- Foster a workplace culture where reporting is encouraged and integrity is promoted within the service.
- understand and comply with their responsibilities in relation to protected disclosures under the National Law
- Ensure protected disclosures are handled in accordance with the National Law and this policy.
- Ensure that educators, staff, students and volunteers are aware of and comply with this policy and know how to access it.

11.3 Educators/ volunteers/ students will

- Immediately report all incidents, allegations and complaints relating to child safety and any breaches or suspected breaches of the National Law.
- Cooperate with any assessment or investigation of a protected disclosure
- Maintain confidentiality in relation to protected disclosures and investigations
- Support colleagues who make protected disclosures
- Complete required training and awareness sessions on the importance of making protected disclosures and the protections available to persons making protected disclosures.

11.4 Parent/carers will:

- Be informed of their right to make a protected disclosure
- have access to information on how to make a protected disclosure
- be protected when making a protected disclosure
- have confidence that disclosures will be taken seriously and investigated appropriately.

12. Related Policies and Procedures

- WS 1.3 – Managing Workplace Complaints
- CatholicCare Wollongong Whistleblower Policy
- Code of Ethics and Conduct
- CCW 5 – Child Safeguarding Disciplinary and Misconduct (Reportable Conduct)
- CCW 9 – Client & Stakeholder Feedback
- Child Safeguarding Code of Conduct

13. Related documents and resources

Responding to incidents, disclosures and suspicions of child abuse

Child safety | ACECQA

Education and Care Services National Law Act 2010. (Amended 2023).

Education and Care Services National Regulations. (Amended 2023).

14. Monitoring and Review

This policy will be reviewed periodically to ensure its effectiveness and relevance. Any necessary updates or modifications to ensure compliance with legislative and standard requirements will be communicated to all employees, contractors, and representatives of CatholicCare Wollongong.

Other situations may include:

- Following an incident, to identify gaps and strengthen data protection measures.
- adoption of new tools or systems.
- mergers, restructuring, or shifts in services that impact on current processes.
- As part of routine evaluations to ensure policies remain effective and aligned with best practices.
- If client/s provide feedback or complaints, prompting a review for improvement.
- When inefficiencies or errors are identified.

The agency will formally review this Policy every three years as part of the policy's known life cycle period.

15. Review table

Date	Major, Minor or Administrative	Description of Revision(s)
April 2026	Major	New policy for ECEC in line with updated Child Safe reforms effective from 24 April 2026. This policy is to be used in conjunction with CatholicCare Wollongong Whistleblower policy.