

Whistleblower Policy

1. Purpose and Objectives

The purpose of this policy is to encourage reporting of wrongdoing that is of legitimate concern by providing a safe reporting mechanism and protection for people who make serious wrongdoing disclosures.

2. Definitions, Terms, Acronyms

Canterbury College	Canterbury College Ltd or any controlled entities of Canterbury College Ltd.
Eligible Whistleblower ¹ – Who qualifies for protection?	A Whistleblower who is eligible for protection is an individual such as an officer, employee, service provider or associate (or their relative) who is or has been in a relationship with Canterbury College and who brings a Disclosable Matter to the attention of the school under this policy.
Disclosable Matter ² – What kind of disclosures can be made under this policy?	A disclosure is eligible for protection if it relates to actual or suspected conduct within Canterbury College that is: <ul style="list-style-type: none"> • gross misconduct, or an improper state of affairs or circumstances in relation to Canterbury College • contravention of the <i>Corporations Act 2001</i> • conduct that represents a danger to the public or the financial system • an offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more
Eligible Recipients ³ – To whom should a disclosure be made?	Disclosures qualify for protection if they are made to eligible recipients. Those belong to the following categories of persons: <ul style="list-style-type: none"> • a senior manager of Canterbury College • the Whistleblower Investigations Officer of Canterbury College • an auditor, or a member of an audit team conducting an audit of Canterbury College. Disclosures made to a legal practitioner for obtaining legal advice or legal representation are also protected.
Detriment ⁴	This policy seeks to prevent Whistleblowers from Detriment, which includes the following: <ul style="list-style-type: none"> • dismissal of an employee • injury of an employee in his or her employment • alteration of an employee's position or duties to his or her disadvantage • discrimination between an employee and other employees of the same employer • harassment or intimidation of a person • harm or injury to a person, including psychological harm • damage to a person's property • damage to a person's reputation • damage to a person's business or financial position • any other damage to a person.

¹ Corporations Act 2001 (Cth), section 1317AAA

² Corporations Act 2001 (Cth), section 1317AA (5)(c)

³ Corporations Act 2001 (Cth), section 1317AAC

⁴ Corporations Act 2001 (Cth), section 1317ADA

3. Policy Scope/Coverage

This policy applies to Directors, all employees and volunteers.

4. Policy statement

Canterbury College is committed to maintaining and promoting high standards of integrity, governance and ethical behaviour within the organisation by people at all levels, including the Board, Principal, Senior Management and employees.

Canterbury College encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving the College, its officers or employees and provides protections to individuals who report wrongdoing.

All Canterbury College employees have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing.

5. Guidelines/Procedure/Process

1. Reporting

Canterbury College is committed to providing a safe, reliable and confidential way of reporting any Disclosable Matters.

A report under this Policy can be made if individuals falling into the category of Eligible Whistleblower have reasonable grounds to suspect that Disclosable Matters have taken place.

A report can be made to any of the following persons, noting it may depend on the matter and the person who is the subject of the matter:

- Chair of the Board
- Principal
- Deputy Principal
- Whistleblower Investigations Officer

At any stage, a person in the list above can be skipped if that person is the subject of the report or if the Whistleblower has another reason to believe that the person is not likely to deal with the report properly. While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with the Whistleblower about the report.

As Canterbury is not an 'owned' school of the Anglican Diocese, matters referred to the Anglican Church or Anglican Schools Commission will typically be referred back to the Chair of the Board or the Principal in order for the College's appointed Whistleblower Investigations Officer can investigate.

2. Investigation

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not concerns are substantiated, with a view to rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of the Whistleblower and anyone who is the subject of the Disclosable Matter. The investigation will also have proper regard to the principles set out in the *Australian Standard AS8004-2003 on Whistleblower Protection Program for Entities*.

The Whistleblower will receive feedback regarding the investigation arising from their report, subject to considerations of the privacy of anyone who is the subject of the Disclosable Matter and standard confidentiality requirements.

3. Protections

The Australian Securities and Investment Commission (ASIC) provides general information about [protections available to Whistleblowers](#).

At Canterbury College, a Whistleblower will not be disadvantaged by having made a report. This includes not being disadvantaged by way of dismissal, demotion, any form of harassment, discrimination or current or future bias (see definition of “Detriment”). This protection extends to the Whistleblower’s colleagues and relatives.

If reprisals are taken or are claimed to have been taken against a Whistleblower, the Whistleblower Protection Officer will investigate the matter and recommend appropriate action be taken. The Whistleblower has a right to make requests through the Whistleblower Protection Officer for positive actions of protection to be taken.

Canterbury College will keep the reporting confidential and secure within the law. It will not disclose the identity of a Whistleblower, nor disclose information that is likely to lead to the identification of the Whistleblower, unless required under law.

4. Awareness

Canterbury College will ensure that all its officers and employees are aware of this policy in the following ways:

- Induction Procedures
- Continuous training procedures
- Access provided via the College’s Policy and Procedures Repository

6. Roles and Responsibilities

Whistleblower Protection Officer

At the request of the Whistleblower, the **Payroll and HR Manager** can be appointed as a Whistleblower Protection Officer and will safeguard the interests of the Whistleblower in terms of this policy and any applicable legislation and standards. The Whistleblower Protection Officer will be readily accessible by all employees and will have direct, unfettered access to independent financial, legal and operational advisers as required.

The Whistleblower Protection Officer can be contacted by the following means:

- email: j.hoad@canterbury.qld.edu.au
- phone: 07 3299 0823
- in person: Canterbury College, 182 Old Logan Village Road, Waterford QLD 4133
- anonymously: Via Mail - Canterbury College, PO Box 616, Beenleigh QLD 4207

Whistleblower Investigations Officer

The **Director of Business and Finance** is appointed as a Whistleblower Investigations Officer and will investigate the substance of the complaint to determine whether there is evidence in support of the matters raised or to refute the report.

The Whistleblower Investigations Officer can be contacted by the following means:

- email: j.louw@canterbury.qld.edu.au
- phone: 07 3299 0819
- in person: Canterbury College, 182 Old Logan Village Road, Waterford QLD 4133
- anonymously: Via Mail - Canterbury College, PO Box 616, Beenleigh QLD 4207

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Acknowledgements:	<i>Corporations Act 2001 (Cth)</i> <i>Australian Standard AS8004-2003 Whistleblower Protection Program for Entities</i>