

Whistleblower Policy

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Local Document Code (if applicable) XXXXXXX	Approval Authority RMD OneSchool Global Australia	Document Author Global Governance & Legal Team
Enquiries Contact: support@oneschoolglobal.com	Associated Documents Code of Conduct Policy (in each State) Anti-bullying/Child Protection Policy (in each State) Grievance Policy (in each State) Corporations Act 2001(Cth) – Sect 1317AI Whistleblower Policy Guideline	

1. PURPOSE

Our Whistleblower Policy (this “Policy”) has been put in place to ensure any employee or other Whistleblower can raise concerns regarding any misconduct, improper situation, or circumstances (including unethical, illegal, corrupt, fraudulent, or other inappropriate conduct) without being subjected to victimisation, retaliation, harassment, or discriminatory treatment. The Whistleblower Policy aligns with the Code of Conduct. The OSG Ethos, Values Statement, and Guiding Principles are incorporated to the Code of Conduct.

2. SCOPE

OneSchool Global Australia will not condone the victimisation of an individual who intends to report or has reported such conduct as a Protected Disclosure (refer to section 6) in accordance with this Policy.

This Policy is adopted to provide a safe and confidential environment where such concerns can be raised by a Whistleblower without fear of reprisal or detrimental treatment. It also aims to develop practices that reduce the risk of Reportable Conduct (refer to Section 7) within OneSchool Global Australia, and safeguard the reputation, values, and ethics of the organisation.

3. POLICY OBJECTIVES

The Policy provides any person making an allegation of Reportable Conduct with a clear framework within which to make that allegation as a Protected Disclosure to:

- 3.1 Ensure any reports of Reportable Conduct are dealt with appropriately and promptly.
- 3.2 Provide a Whistleblower with a clear understanding of how allegations will be handled.
- 3.3 Protect a Whistleblower from victimisation and retaliation.
- 3.4 Support a Whistleblower throughout the reporting process.
- 3.5 Afford natural justice and procedural fairness to anyone who is the subject of an allegation of Reportable Conduct.

Provide reasonable protections for a Whistleblower who, acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true, raises concerns about Reportable Conduct. It also ensures allegations of Reportable Conduct are properly and lawfully investigated and addressed.

4. DEFINITIONS

Term	Definition
OneSchool	The operating entity of OneSchool at either Global or Regional level.
RMD	Regional Managing Director
RP	Regional Principal
WIO	Whistleblower Investigation Officer, as appointed by OneSchool.

5. WHO CAN MAKE A DISCLOSURE?

This Policy applies to a “Whistleblower”, which means anyone who is, or has been, any of the following with respect to OneSchool Global Australia:

- 5.1 An employee.
- 5.2 A Director, a Board member, a member of the Management Team or a member of a Campus Committee.
- 5.3 A contractor (including an employee of a contractor).
- 5.4 A supplier (including employees of suppliers).
- 5.5 A consultant.
- 5.6 A relative, dependant, spouse, or dependent of a spouse of any of the above.
- 5.7 The protections in this Policy will also apply to anyone who has made a disclosure of information relating to the organisation to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblowing protection laws.

6. PROTECTION OF A WHISTLEBLOWER

A “Protected Disclosure” is a report of conduct made in accordance with this Policy. Nothing in this Policy is intended to abrogate or diminish any additional or alternative protections which may be available at law.

- 6.1 To be protected under this policy, a Whistleblower must adhere to the following:
 - 6.1.1 Be acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true.
 - 6.1.2 Make the disclosure in accordance with this Policy (be an eligible Whistleblower and make the disclosure to an eligible recipient); and
 - 6.1.3 Not themselves have engaged in serious misconduct or illegal conduct in relation to the Reportable Conduct.
- 6.2 Protection from disciplinary action, victimisation, or retaliation.

OneSchool Global Australia promotes a culture that encourages the notification of Reportable Conduct. Where a Whistleblower makes a Protected Disclosure, that person will be protected from disciplinary action, victimisation, retaliation or claims by OneSchool Global Australia as a result of having made the report. The Whistleblower must, always during the reporting process, continue to comply with this Policy.

In circumstances where, for any reason, the identity of the Whistleblower is known outside of the investigation process, OneSchool Global Australia will take reasonable steps to protect the Whistleblower from retaliatory or discriminatory action where it has sufficient authority to do so. OneSchool Global Australia has no power to offer any person immunity against prosecution in the criminal jurisdiction or from any civil action which may be brought against the Whistleblower.

In some jurisdictions, in addition to the protections provided for under this Policy, a person making an allegation of Reportable Conduct may be protected by local law from civil and/or criminal proceedings, and, against retaliatory or discriminatory action as a result of having made an allegation protected by applicable local law.

A Whistleblower should be aware that, in some jurisdictions, making an allegation to a government authority without using OneSchool Global Australia's internal procedure may result in the loss of Whistleblower protection available under this Policy.

7. MATTERS TO BE REPORTED

Any matter that a Whistleblower suspects or has reasonable grounds to suspect is a misconduct or an improper situation or circumstances or is in breach of OneSchool Global Australia's policies, the law, should be reported in accordance with this Policy. Suspicion being an idea or impression that is not fanciful, illogical, or irrational.

Please note that personal work-related grievances are excluded from this Policy and are handled through the Grievance Process. See below.

OneSchool Global Australia relies on its employees to help maintain and grow its culture of honest and ethical behaviour. It is therefore expected that any Whistleblower who becomes aware of reportable conduct will make a report.

7.1 A reportable matter includes any conduct that involves:

7.1.1 Dishonest behaviour or abuse of authority.

7.1.2 Theft, fraud, money laundering or misappropriation.

7.1.3 Unlawful, corrupt, or irregular use of company funds or practices.

7.1.4 Illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property).

7.1.5 Offering or accepting a bribe.

7.1.6 Unethical behaviour, including anything that would breach the OneSchool Code of Conduct and Ethos.

7.1.7 Improper or misleading accounting or financial reporting practices.

- 7.1.8 A breach of any legislation relating to OneSchool Global Australia's operations or activities, including the Corporations Act 2001 (Cth).
- 7.1.9 A serious breach of OneSchool Global Australia's policies and procedures.
- 7.1.10 Behaviour that is oppressive, discriminatory, or grossly negligent.
- 7.1.11 Bullying, discrimination, harassment, or abuse.
- 7.1.12 Victimising someone for notifying a Reportable Conduct.
- 7.1.13 An unsafe work-practice or any behaviour that poses a serious risk to the health and safety of any person at the workplace.
- 7.1.14 A serious risk to public health, public safety, or the environment.
- 7.1.15 Any instruction to cover up or attempt to cover up serious wrongdoing.
- 7.1.16 Any other conduct which may cause loss to OneSchool Global Australia or be otherwise detrimental to the interests of OneSchool Global Australia.

This Policy extends to serious wrongdoing that occurs before or after the commencement of this Policy and is not limited to the above examples.

7.2 Personal Work-Related Grievance

Personal work-related grievances are not covered under this Policy and should be reported in the first instance to your line manager or Human Resources in accordance with the Grievance Process

A "Personal Workplace Grievance" is a grievance about any matter in relation to the Whistleblower's employment, or former employment, having (or intending to have) implications for the Whistleblower personally. This includes:

- 7.3 An interpersonal conflict between the Whistleblower and another employee.
- 7.4 A decision relating to the engagement, transfer, or promotion of the Whistleblower.
- 7.5 A decision relating to the terms and conditions of engagement of the Whistleblower.
- 7.6 A decision to suspend or terminate the engagement of the Whistleblower, or otherwise to discipline the Whistleblower.

However, it does not include:

- 7.7 Any conduct that would be considered victimisation of any individual because they have made, may have made, or propose to make a report under the Policy; or a matter that would have significant implications for the organisation.

8. HOW TO MAKE A DISCLOSURE

Sometimes, a suspicion of wrongdoing may arise from a misunderstanding and is not in fact wrongdoing. Accordingly, employees are encouraged to first report any matters of concern to their direct line manager or local Human Resources representative.

8.1 Reporting to Eligible Recipients

A disclosure can be made to an “eligible recipient” within the organisation. Eligible recipients in relation to OneSchool Global Australia are:

8.1.1 Directors; a Board member, member of the Management Team or Regional Principal; or

8.1.2 Senior Managers;

8.1.3 HR Directors.

8.2 Reports to an eligible recipient:

8.2.1 Must be made in person, by telephone or email

8.2.2 The Whistleblower must first inform the eligible recipient that they wish to make a report under this Policy.

8.3 Reporting to the WIO

OneSchool Global Australia has appointed WIOs who will:

8.3.1 Safeguard the interests of a Whistleblower.

8.3.2 Assess the immediate welfare and protection needs of a Whistleblower and seek to foster a supportive work environment.

8.3.3 Respond as appropriate and necessary to any concerns or reports of victimisation by a Whistleblower.

If a Whistleblower is unable or uncomfortable reporting matters of concern to their direct line manager or local Human Resources representative, a report can be made directly to the WIO. Reports to the WIO:

8.3.4 Must be made in person or by telephone or email.

8.3.5 The Whistleblower must first inform the WIO that they wish to make a report under this Policy

OneSchool Global Australia WIOs are:

8.3.6 **Marty Bowen**, Global Head of Human Resources, OneSchool Global

8.3.6.1 Contact details: M. +61 (0)413 706 261 or marty.bowen@oneschoolglobal.com

8.3.7 **Jackie May**, Regional Director of Human Resources, OneSchool Global Australia

8.3.7.1 Contact details: M. +61 (0)438 536 834 or jackie.may@au.oneschoolglobal.com

8.4 Consequences of Making a False Report

Anyone who knowingly makes a false report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including termination of employment.

The disciplinary action will depend on the severity, nature, and circumstance of the false report.

8.5 Reports concerning the RMD or RTL and WIO

If a report involves the RTL or a WIO (or both representatives for the avoidance of OneSchool Global Australia), this will be directed to the OneSchool Global Australia MD for investigation and further action.

8.6 Reports to Other Bodies

In certain circumstances a Whistleblower may have a legal obligation to make a report to a statutory body or government department. A Whistleblower should ensure that they comply with all such reporting requirements. The WIO can advise a Whistleblower on the reporting obligations.

8.7 Investigating a Disclosure

A Whistleblower's report may only be investigated and acted upon following referral to a WIO. Any other person (such as a supervisor or manager) when notified of Reportable Conduct must immediately refer it to the WIO(s), take no further action and keep the report confidential.

8.8 All Information Referred to WIO

Once received, all allegations of Reportable Conduct pursuant to this Policy must be referred to the WIO(s) and include, at a minimum, the following details:

- 8.8.1 The date the Whistleblower made the report.
- 8.8.2 The date and substance of the Reportable Conduct.
- 8.8.3 The identity and level of seniority of the alleged wrongdoer.
- 8.8.4 The level of risk associated with the alleged wrongdoing.

8.9 Initial Review by WIO

The WIO(s) will determine whether sufficient information exists to allow the report(s) to be investigated, whether an investigation is required, and, if so, determine the appropriate investigation process, including:

- 8.9.1 The nature and scope of the investigation.
- 8.9.2 Who will conduct the investigation and whether that person should be external to OneSchool Global Australia.
- 8.9.3 The nature of any technical, financial, or legal advice that may be required.
- 8.9.4** An estimated timeframe for the investigation (having regard to the allocated level of risk).

8.10 Update on Progress of Investigation

The Whistleblower will, if OneSchool Global Australia deems it appropriate and permissible to do so, be informed on a continuing basis as to the nature and progress of the investigation

8.11 Use of External Professionals During Investigation

An external professional(s) may be engaged, to assist with, or conduct, the investigation process.

OneSchool Global Australia may be required to refer an allegation of Reportable Conduct to the Police or other agencies. In such circumstances, OneSchool Global Australia may not be able to keep a Whistleblower informed on the progress of a Protected Disclosure. The timing of an investigation will depend on the circumstances of the matter and whether OneSchool Global Australia is the primary investigator of the disclosure.

8.12 Investigation Findings

OneSchool Global Australia will apply principles of procedural fairness and natural justice to the conduct of any investigation and resultant findings arising under this Policy.

The person leading any investigation will report their findings to the relevant WIO and advise the recommended course of action (if any) that OneSchool Global Australia should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of OneSchool Global Australia.

A WIO will determine the action (if any) to be taken. If appropriate, and subject to any applicable confidentiality, privacy, or legal constraints, the WIO may notify the Whistleblower of the conclusion of the investigation and the action taken.

8.13 Record Keeping and Accountability

OneSchool Global Australia will establish and maintain a record of all reports of Reportable Conduct received, the investigation process undertaken, and any actions taken to resolve the matter.

9. CONFIDENTIALITY AND PRIVACY

9.1 Whistleblower identify must be kept confidential

OneSchool Global Australia will make all reasonable efforts, as required under the Corporations Act, to ensure the identity of a Whistleblower remains confidential throughout the investigation process.

9.2 Permitted Exceptions

OneSchool Global Australia will not disclose a Whistleblower's identity unless:

9.2.1 The Whistleblower consents to the disclosure of their identity.

9.2.2 Disclosure of the Whistleblower's identity is compelled by law.

9.2.3 Disclosure is necessary to prevent a serious threat to any person's health or safety.

9.2.4 It is necessary to protect or enforce OneSchool Global Australia's legal rights or interests or to defend any claims.

9.3 Reporting Anonymously

A Whistleblower can report anonymously. Any supervisor or manager who receives a Whistleblower report must not disclose that report to anyone other than a WIO. Unauthorised disclosure of the Whistleblower's identity or information, from which the identity of the Whistleblower may be determined, will be regarded as a disciplinary matter, and will be dealt with in accordance with OneSchool Global Australia's disciplinary procedures.

A Whistleblower must keep all information relating to any allegation confidential at all times, both during any investigation process and following any resolution of an allegation.

10. PROTECTION OF A WHISTLEBLOWER

A Whistleblower will not be subject to any civil, criminal, or disciplinary action for making a report that is covered by this Policy, or for participating in any subsequent investigation.

No employee or contractor may engage in detrimental conduct against a Whistleblower who has made or proposes to make a report in accordance with this Policy, because of such report or proposed report.

All reasonable steps will be taken to ensure that a Whistleblower will not be subjected to any form of victimisation, discriminations, harassment, demotion, dismissal, or prejudice, because they have made a report. However, this Policy will not protect the Whistleblower if they are also involved in or connect to the improper conduct or illegal activities that are the subject of a report.

10.1 Support for a Whistleblower may include:

10.1.1 Connecting the Whistleblower with access to the Employee Assistance Program (EAP) (LifeWorks <https://oneschool-global.lifeworks.com/feed> or +61 396 580 000)

10.1.2 Appointing an independent support person from the Human Resources team to deal with any ongoing concerns they may have.

10.1.3 Connecting the Whistleblower with third party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

Use of these support services by a Whistleblower may require the Whistleblower to consent to disclosure of their identity or information that is likely to lead to the discovery of their identity.

10.2 Prohibition against Victimisation

OneSchool Global Australia is committed to ensuring that any person who notifies Reportable Conduct, acts as a witness, or participates in any way with respect to a report of Reportable Conduct is not victimised.

OneSchool Global Australia will thoroughly investigate reports of victimisation. If proven, any person or persons who have victimised a Whistleblower may be subject to disciplinary action or dismissal.

11. SUPPORT FOR PERSONS IMPLICATED

11.1 Person(s) Implicated

No action will be taken against an employee who is implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated. However, an employee who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department, or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee must be immediately reinstated to full duties.

11.2 Disclosures Relating to Person Implicated

Any disclosure that implicates an employee must be confidential, even if the Whistleblower has consented to the disclosure of their identity and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report. An employee or officer who is implicated in a disclosure has a right to be informed of the allegations against them and must be given an opportunity to respond to those allegations and provide additional information, if relevant, during an investigation into those allegations, subject to the Whistleblower's right to anonymity.

Support available for a person implicated include:

11.2.1 Connecting the person with access to the Employee Assistance Program (EAP).

11.2.2 Appointing an independent support person from the Human Resources team to deal with any ongoing concerns they may have.

11.2.3 Connecting the person with a third-party support provider such as Lifeline (13 11 14) or Beyond Blue (1300 22 4636).

12. CONSEQUENCES FOR NON-COMPLIANCE WITH POLICY

Any breach of this Policy will be taken seriously and could result in counselling and/or disciplinary action, up to and including summary dismissal.

Any alleged breach of this Policy will be taken seriously and may be the subject of a separate investigation

13. COMMUNICATION OF POLICY

It is a requirement that any employee, contractor, or consultant employed or engaged by OneSchool Global Australia, complies with this Policy at all times. However, this Policy does not form part of any agreement or

contract and nor does it constitute terms and conditions of any person's employment or engagement with OneSchool Global Australia.

This Policy will be made available to all employees, contractors, and consultants in electronic form via the OneSchool Global Australia (or State) Intranet.

14. REPORTING REQUIREMENTS

Subject to confidentiality and privacy obligations and as required under the Act or any law, a report of investigation(s), and actions taken as a result of the investigation(s), will be provided to the relevant RTL and/or RMD OneSchool Global Australia

15. VERSION CONTROL

Document Code	Date	Version No.	Nature of Change
POL_OSG AU_GL_Whistleblower Policy_v2.0	19/12/2019	V2.0	Formatting
POL_OSG AU_GL_Whistleblower Policy_v2.1	27/07/2022	V.2.1	Minor changes
POL_OSG AU_GL_Whistleblower Policy_v2.2	Nov 2023	V2.2	Changes to titles and support service provider.