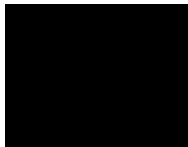





- a) an officer or employee of the School (this includes current and former employees who are permanent, part-time, fixed-term or temporary, interns, secondees, managers and Board Members);
- b) a person who supplies goods or services to the School or an employee of a person who supplies goods or services to the School (whether paid or unpaid) - this could

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- a) misconduct (e.g. fraud, negligence, default, breach of trust and breach of duty (e.g. the School's Child Safety Code of Conduct)) – for example, it may include:
  - i. illegal conduct such as theft, dealing in, or use of illicit drugs, violence or threatened violence and criminal damage against property;
  - ii. fraud, money laundering or misappropriation of funds;
  - iii. offering or accepting a bribe;
  - iv. financial irregularities or other financial matters (e.g. 61(2)(c), 90(3)(c), 2(3)(5), 4(5)(g), 7(1)(b), 14.3

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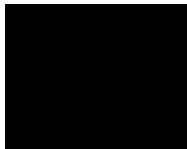


- j) conduct that constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
  - k) conduct which represents a danger to the public or the financial system; or
  - l) breach of a matter that is prescribed by regulation,
- in relation to the School.

where: is the disclosure of information to a journalist or a parliamentarian,

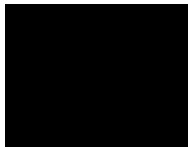
- a)







- the disclosure is authorised under the Corporations Act.
- ii. Staff members who breach the identity protection provisions outlined in this section will be subject to disciplinary action, which may include summary dismissal.
- b)
- i. It is illegal for a person to engage in conduct that causes (or threatens) detrimental treatment to an Eligible Whistleblower in the belief or suspicion that they have made, may make, proposes to make or could make a report of a Disclosable Matter and where that belief or suspicion is a reason for the conduct.
- ii. Detrimental treatment against an Eligible Whistleblower could include:
- 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; or
  - any other damage to a person.
- ii. Detrimental conduct does not include:
- administrative action that is reasonable for the purpose of protecting an Eligible Whistleblower from detriment (e.g. moving an Eligible Whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detriment); or
  - managing an Eligible Whistleblower's unsatisfactory work performance, if the action is in line with the School's performance management framework.
- c)



i. an Eligible Whistleblower





c) be independent of the person(s) about whom an allegation has been made.

Provided there are no restrictions or other reasonable bases for doing so, people against whom an allegation has been made will be informed of the allegation and will have an opportunity to respond to any allegation. That is, the School will take steps to ensure fair treatment of any person who is the subject of the Disclosable Matter as well as the Eligible Whistleblower.

Investigations will be conducted promptly and fairly with due regard for the nature of the allegation and the rights of the people involved in the investigation. The School recognises the importance of balancing the rights of the Eligible Whistleblower and the rights of people against whom a report is made in ensuring fairness.

The School will ensure that the Eligible Whistleblower is kept informed of the outcomes of the investigation of their allegations unless the claim was submitted anonymously. This will be subject to the considerations of privacy of those against whom allegations are made and considerations of confidentiality affecting the School.

If the Eligible Whistleblower is not an employee of the School, the Eligible Whistleblower will be kept informed of the investigative outcomes (subject to other considerations as above), once the Eligible Whistleblower has agreed in writing to maintain confidentiality in relation to any information provided to them regarding a Disclosable Matter made by them.

The School has confidential counselling services available to Eligible

