

# EREA Colleges Ltd

## Whistleblower Protection Policy

### 1.0 Purpose

EREA is committed to best practice governance and stewardship in accordance with legislative requirements for not-for-profit and charitable bodies.

EREA encourages whistleblower action consistent with this policy and the accompanying Guidelines.

A Whistleblower function is an important tool for assisting EREA to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosure. Furthermore, it aims to:

- Encourage disclosures of wrongdoing;
- Help deter wrongdoing in accordance with EREA's risk management and governance framework;
- Ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- Ensure disclosures are dealt with appropriately and on a timely basis;
- Provide transparency around EREA's processes for receiving, handling and investigating disclosures;
- Support EREA's Charter, Touchstones and Code of Conduct; and
- Meet with EREA's legal and regulatory obligations.

The services of an external service provider, YourCall, are utilised to allay concerns regarding the perception that internal methods may be compromised. The core functions of the external provider are to:

- Objectively and independently receive and assess disclosures;
- Protect the person's anonymity;
- Conduct investigations where required, either legislatively or at the request of EREA; and
- Appropriately escalate a qualifying disclosure to the designated delegation within EREA for further action or investigation.

## 2.0 Policy Statement

EREA Colleges Ltd (EREA) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report wrongdoing.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts against anyone who intends to disclose or has disclosed wrongdoing.

## 3.0 Scope and Application

This policy applies to all EREA Colleges Ltd schools, entities and offices.

## 4.0 Roles and responsibilities

Role	Responsibilities
EREA Council / EREA Ltd	<ul style="list-style-type: none"><li>Receiving and managing disclosures made against the EREA Board Chair</li></ul>
EREA Colleges Ltd Board	<ul style="list-style-type: none"><li>Approving this policy</li><li>Ensuring appropriate guidelines are developed to assist all to comply with the Policy</li><li>Ensuring this policy is reviewed and updated as needed</li><li>Monitor the number and nature of whistleblower reports</li></ul>
EREA Colleges Ltd Board Chair	<ul style="list-style-type: none"><li>Receiving and managing disclosures made against the CEO</li></ul>
EREA Colleges Ltd CEO / ELT	<ul style="list-style-type: none"><li>Ensuring this policy is implemented</li><li>Developing and reviewing the accompanying guidelines supporting adherence with this policy</li><li>Appointing EREA Disclosure Officers</li></ul>
Principals and Educational Bodies	<ul style="list-style-type: none"><li>Implementing this policy and accompanying guidelines</li></ul>

## 5.0 Procedures and Guidelines

There are two sets of Guidelines linked to the Whistleblower Protection Policy which provide guidance and outline our responsibilities under the law:

- a) The Employee Guideline is for employees, service providers and contractors, and
- b) The Parent & Student Guideline is for parents and students.

Although there are legislative differences in how the employees of organisations captured under the Corporations Act must be protected, and how students and parents must be treated under state and federal legislation when reporting a “wrongdoing”, EREA treats all whistleblowers fairly and equitably and provides best practice whistleblower protection support.

## 6.0 Breach of this Policy

Individuals who breach this Policy may be subject to disciplinary action, including and up to termination of their employment. In some circumstances, a breach of this Policy will amount to a breach of relevant legislation. In these circumstances, the individual may be liable for further penalties under the legislation.

Individuals who are aware of a suspected breach of this Policy should refer to either EREA's procedure for reporting complaints or this policy for making a whistleblower report. Either form of report will be treated confidentially.

## 7.0 Policy Review

This policy will be reviewed every three (3) years unless there is a legislative or regulatory requirement to do so earlier.

## 8.0 Related policies, procedures and legislation

### Related Legislative Instruments

The following legislation, standards and regulations apply and this policy aligns with these mandated requirements:

- (a) Corporations Act (2011)
- (b) ASIC's Regulatory Guidance 270.

### EREA Colleges Ltd and related documents and policies

This policy should be read in conjunction with the following related documents:

- a) Guidelines – EREA Whistleblower Protection Policy for Employees & Service Providers
- b) Guidelines – EREA Whistleblower Protection Policy for Students & Parents
- c) EREA Whistleblower Program (PolicyConnect)
- d) The Charter for Catholic Schools in the Edmund Rice Tradition
- e) EREA Code of Conduct
- f) EREA Child Safeguarding Policies
- g) EREA Complaints Handling Policy
- h) EREA Internal Grievance Policy
- i) EREA Health, Safety & Wellbeing Policy

EREA Ltd Whistleblower Protection Policy	
Policy Owner	CEO – EREA Colleges Ltd
Approving Body/Role	EREA Colleges Ltd - Approver
Subject Matter Adviser	Director of Risk & Compliance – EREA Colleges Ltd
Priority Rating	High - Adopt
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