

Whistleblower Policy & Procedure

Version: 4

Policy Owner: CEO

Approved by: The Board

Original Approval Date: December 2020

Current Approval Date: July 2026

Next review Date: July 2028

Purpose

The purpose of this Policy and Procedure is to:

- Encourage whistleblowers to come forward with their concerns and protect them when they do in compliance with requirements for large proprietary companies under the *Corporations Act 2001* (Cth);
- Facilitate confidential reporting of issues with significant implications which could cause damage to For Purpose Education or result in injury to its learners, employees or contractors;
- appreciate there must be reasonable grounds supporting a report made under this policy and procedure, and any person reporting such conduct must be willing to explain those grounds;
- Provide procedural information to employees about how and to whom a report of Reportable Conduct can be made;
- Outline what For Purpose Education will do to investigate a report of Reportable Conduct;
- Protect whistleblowers and ensure these protections are adhered to;
- Provide information about how this policy will be made available to officers and employees of the company.

This policy and procedure do not replace the workplace grievance or formal complaints policy and procedure and is not to be used to report and resolve grievances or complaints. A report that is found to be malicious, deliberately misleading, or frivolous may result in disciplinary action.

Scope

This policy applies to all activities, and employees involved in those activities, that take place:

- on work premises.
- elsewhere where activities are undertaken in the course of employment including when representing For Purpose Education in virtual and online settings; and
- at work-related activities, such as social functions.

Reference to employees within the policy includes both contractors and volunteers.

Definitions

Term	Definition
Authorised Disclosure Officers	Nominated roles within For Purpose Education to provide reports to, these are the Chief Executive Officer (CEO) and the Group Corporate Governance Manager.
Confidential Reporting	The process of reporting concerns or misconduct in a manner that protects the identity of the whistleblower.
Ethical Behaviour	Conduct that aligns with the organisation's values and ethical standards.
Investigation	The process of examining reported concerns to determine their validity and take appropriate action.
Investigator	Impartial person/s delegated by an Authorised Disclosure Officer to investigate allegations raised through the For Purpose Education Whistleblower Procedure.
Legal Compliance	Adherence to all relevant laws and regulations governing workplace conduct and whistleblower protections.
Misconduct	Any behaviour that is illegal, unethical, or in violation of company policies, including but not limited to fraud, corruption, theft, harassment, and discrimination.
Non-Retaliation	A commitment by the organization to protect whistleblowers from any form of retaliation for reporting misconduct.
Reasonable Grounds	Means that a reasonable person in the position of the Whistleblower would also suspect the conduct is Reportable Conduct.
Retaliation	Any adverse action taken against a whistleblower as a result of their report, including termination, demotion, harassment, or any other form of punishment.
Reportable conduct	Conduct by a person or persons connected with For Purpose Education, which the Whistleblower has Reasonable Grounds to suspect is • dishonest; • committing fraud and/ or involved in a fraudulent activity; • corrupt; • acting illegally; • in breach of Commonwealth, State or Territory legislation, or local authority bylaws; • acting unethically; • engaging in other serious improper conduct; • engaging in an unsafe work-practice; • making conscious decisions that may result in financial or non-financial loss to For Purpose Education or otherwise be detrimental to the interests of For Purpose Education, including gross mismanagement.
Support and Protection	Measures taken by the organisation to support and protect whistleblowers throughout the reporting and investigation process.
Victimisation	Includes injury, damage or loss, intimidation or harassment, discrimination, damage to reputation, damage to financial position or business, disadvantage or adverse treatment in relation to a person's employment or threats of reprisal and includes such acts against a person related to or associated with the Whistleblower.

Whistleblower	Means a person who, whether or not anonymously, makes, attempts to make or wishes to make a disclosure in respect of Reportable Conduct within For Purpose Education and seeks protection against victimisation.
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Principles

Commitment to Ethical Standards: we value our positive workplace culture of integrity, transparency, and accountability. We are aware that appropriate whistleblowing supports compliance obligations and help contribute to maintaining the For Purpose Education values.

Anonymity and Confidentiality: we know we can safely report concerns anonymously and that For Purpose Education will maintain strict confidentiality unless legally required otherwise.

Accessibility of Reporting Channels: we provide a simple and clear procedure to report issues.

Good Faith Reporting: we know sincerity and honesty are valued. We understand that malicious or false reporting undermines trust and integrity.

Protection from Retaliation: we are confident we will not face discrimination, dismissal, or harassment for reporting concerns in good faith. We know For Purpose Education has a zero-tolerance policy for retaliation.

Fair and Impartial Investigations: we know all concerns will be investigated thoroughly and objectively, adhering to principles of procedural fairness and ensuring that no one is unjustly targeted.

Reporting

Where an individual wishes to report any matter, they should follow the For Purpose Education Whistleblower Procedure. The list of matters that constitute Reportable Conduct is in the Definitions section.

Protection for Whistleblowers

A whistleblower can begin accessing protection from the date they either make an internal report to For Purpose Education or make an external report to For Purpose Education's auditor or external complaints service (if one has been arranged).

A whistleblower reporting Reportable Conduct and who has not been involved in the Reportable Conduct will not be penalised or personally disadvantaged because he/ she/ they have made a report.

For Purpose Education will not tolerate any victimisation of a whistleblower. It is illegal for someone to threaten a person because they suspect or believe a person has made or will make a report of Reportable Conduct, or to cause such a threat. A whistleblower who believes that he / she/ they, or a person related or associated with the whistleblower, has been victimised because of their status as whistleblower should immediately report this to an Authorised Disclosure Officer or if appropriate, to their manager.

A director, employee, officer or contractor of For Purpose Education who engages in victimisation of a whistleblower because of his or her status as whistleblower may be subject to disciplinary measures or, if a contractor, termination of contract. There may also be civil and criminal penalties that may apply for victimising or causing detriment to a Whistleblower and for breaches of confidentiality.

Whistleblowers and For Purpose Education must keep confidential all reports associated with the

Reportable Conduct and any associated investigation.

Protection Against Detriment

Employees will not be subjected to retaliation, discrimination, or harassment for making a report in good faith. Any act of reprisal against an employee will result in disciplinary action.

Available Support

- Access to Employee Assistance Programs (EAP). Information is located on ELMO home page. EAP is a wholly independent resource with no detailed reporting back to For Purpose Education. Staff should feel confident to use this confidential resource.
- Legal protections under the *Corporations Act 2001* (Cth).

Responsibilities

Role	Key Responsibilities
Board	Approve and review the Whistleblower Policy and Procedure
	Ensure adequate resources for compliance
	Monitor risk to strategic plan and ensure proper reporting and mitigation
CEO	Ensure the Whistleblower Policy and Procedure is implemented effectively
	Oversee responses to reports and provide updates to the Board
	Ensure the allocation of necessary resources for coordinated responses
Authorised Disclosure Officers	Exercise discretion, impartiality when receiving any report
	Be thorough in all aspects of managing any report including adhering to compliance obligations
People & Culture	Conduct training and awareness programs for employees
	Ensure all employees are aware of compliance obligations in respect of both internal and external reporting
	Implement data security and access control measures for employee information / disclosures
	Provide support to all employees involved in a disclosure process
Employees	Comply with the Whistleblower Policy and Procedure
	Safeguard For Purpose Education information and report potential breaches to safeguard For Purpose Education's interests
	Participate in training and awareness processes, act in good faith, support the For Purpose Education values, cooperate with any process approved by the CEO

References and Related Policies

Reference	Document Type
Age Discrimination Act 2004 (Cth)	Legislation
Code of Conduct	Code
Corporations Act 2001 (Cth)	Legislation
Disability Discrimination Act 1992 (Cth)	Legislation
Educational Services (Post – Secondary Education) Award 2020	Award
Employee Assistance Program (EAP)	Program
Fair Work Act 2009 (Cth)	Legislation
Governance Policy – Laws and Regulations	Policy
Grievance Policy and Procedure	Policy and Procedure
Flexibility Policy	Policy
Leave Policy	Policy
Occupational Health and Safety Act 2004 (Vic)	Legislation
Privacy Policy	Policy
Racial Discrimination Act 1975 (Cth)	Legislation
Sex Discrimination Act 1984 (Cth)	Legislation
Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019	Legislation
Workplace Bullying Policy	Policy
Work Health & Safety Act 2022 (Cth)	Legislation

Training and Development

All employees engaged in any part of the business are bound by this legislation and are required to complete training.

Training name	Training type	Aim	Identified staff	Frequency
Whistleblower Policy & Procedure	Educative	Educate staff about Whistleblower obligations, situations, procedure for reporting	All	Induction As directed by Manager
Information Disclosures for Corporate Whistleblowers – ELMO	Educative	Building ethical conduct	Managers	Annually
Code of Conduct	Educative	Set the standard for staff actions and interactions and promote inclusive leadership	All	Induction As directed by Manager

Version Control and Revision Information

For Purpose Education reserves the right to vary, replace or terminate this policy at any time.

Version #	Approval Date	Approved By	Details
1	December 2019	The Board	New Policy
2	December 2020	CEO	Reviewed policy Added in name of Whistleblower legislation and link Added relevant section of the Corporations Act and link Added corporate penalties; and Reformatted
3	April 2025	The Board	Updated to a new template Section 1 - Purpose - edited to reduce duplication Section 2 – Scope – edited Section 3 – Definitions – alphabetised, edited to include all terms mentioned in the policy, removed roman numbering Section 4 – Principles – created content Section 5 – Responsibilities – created content Section 6 – References – edited to include Corporations Act, Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 and EAP Section 7 – Training – proposed content New Decoupled Procedure from Policy
4	July 2026	CEO	Administrative updates: Updated template to new business name For Purpose Education, with and name updated throughout policy. Authorised Officer from CFO to Group Corporate Governance Manager.

Whistleblower Procedure

Purpose

This procedure outlines the process for reporting and addressing concerns raised under the For Purpose Education Whistleblower Policy. It ensures compliance with relevant Australian laws, including the *Corporations Act 2001* (Cth), and provides a framework to protect individuals who report misconduct that has significant implications for For Purpose Education.

Scope

This procedure applies to:

- All employees, contractors, and volunteers.
- Reference to employees within the policy includes both contractors and volunteers.

Reporting Misconduct

What Can Be Reported:

Employees may report reasonable concerns about suspected or actual misconduct, including but not limited to:

- deliberate or unintentional dishonesty;
- fraud, corruption, or unethical behaviour.
- acting illegally
- breaching any legislation, regulations or local authority bylaws
- acting unethically;
- engaging in other serious improper conduct;
- engaging in an unsafe work-practice;
- making conscious decisions that may result in financial or non-financial loss to For Purpose Education or otherwise be detrimental to the interests of For Purpose Education, including gross mismanagement.

Who to Report to:

Reports can be made to:

- Our Authorised Officers: CEO or Group Corporate Governance Manager.
- External Reporting Mechanisms: Relevant regulatory bodies (e.g., ASIC, ATO).

How to Report:

Employees may report concerns via:

- Written report (email or physical letter).
- Verbal report (in person or via phone), which must be followed up in writing within 5 business

days.

- Anonymous reporting through an [online form](#).

Handling Reports

Initial Acknowledgment

The Authorised Officer will acknowledge receipt of the report within [5 days], unless the report is made anonymously.

Assessment of the Report

All reports will be assessed to determine:

- Whether the report falls within the scope of the For Purpose Education Whistleblower Policy.
- The seriousness, severity and credibility of the allegations.

Investigation Process

Appointing an Investigator:

The Human Resources Manager will be assigned to examine the allegations, unless the allegation involves the Head or employees in that section. The investigator will:

- review the report;
- determine the approach to be taken in the conduct of the investigation; and
- inform the whistleblower and the Authorised Disclosure Officer of how the investigation will proceed;
- the investigator will plan and conduct the investigation, including with the assistance of other employees or external advisers if considered necessary;
- the investigator may request additional information, evidence and consider For Purpose Education processes with a view to propose control improvements (risk assessments, audits etc);
- the investigator will prepare an investigation report and submit the investigation report to the Authorised Disclosure Officer; and
- the Authorised Disclosure Officer will advise and debrief the whistleblower.

At the end of the investigation, the CEO will determine the appropriate response and any other actions. This response will include addressing any unacceptable conduct and taking any remedial action required to prevent any future occurrences of the same Reportable Conduct.

The CEO will ensure the Board has oversight of any report and provide timely information and actions and seek direction as required.

If the CEO is the subject of Reportable Conduct, the Board will appoint an investigator and determine the response and any corrective measures.

Confidentiality

The identity of the employee will be protected unless disclosure is required by law.

Timelines

Investigations will aim to be completed within [4-8 weeks – dependent on the complexity of the investigation], with regular updates provided to the employee (if their identity is known).

Outcomes of Investigation

The investigator will prepare a report summarising findings and recommendations. Based on the findings:

- Appropriate corrective actions will be taken.
- Relevant authorities may be notified if required by law.

Protection Against Detriment

Employees will not be subjected to retaliation, discrimination, or harassment for making a report in good faith. Any act of reprisal against an employee will result in disciplinary action.

Support Available

- Access to Employee Assistance Programs (EAP).
- Legal protections under the Corporations Act 2001 (Cth).

Record-Keeping and Confidentiality

- Records of whistleblowing reports and investigations will be securely maintained for [7 years].
- Access to records will be restricted to authorised personnel only.

Contact Information

For more information or guidance, please contact your manager.