

# WHISTLEBLOWER POLICY

Approved by FSAC Ltd Board: 29 October 2020

Version: 1.1

Last Reviewed: 23 September 2020

Next Review: 1 October 2023

Contact Officer: Manager Human Resources and Compliance

## 1 Statement

The Board is committed to maintaining and promoting high standards of conduct, integrity, governance and ethical behaviour by people at all levels including the Board, College Councils, Principals, Executive Leadership Team, Senior Leadership Team and employees.

The Board 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 employees of FSAC Ltd Colleges have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing.

SPECIAL NOTE: This policy should be read in concert with Student Protection in Anglican Schools Policy and Procedures which deals with matters of harm, sexual abuse or inappropriate behaviour. The Student Protection Policy and Procedures must be kept at the forefront when considering and implementing the contents of this policy and associated procedures. In the event that reasonable suspicions exist that harm, and/or sexual abuse has occurred or is likely to occur, the Student Protection Policy and Procedures must be followed.

## 2 Scope

This policy and its affiliated procedure apply to the FSAC Ltd. organisation and its staff, volunteers and contractors.

## 3 Principles

This policy exists to encourage the reporting of corrupt, illegal or otherwise undesirable conduct at FSAC Ltd Colleges.

## 4 Legal and Other Reference Material

Refer to Appendix 1 for a list of Acts and Regulations which apply to this policy.

### 4.1 Affiliated Authorities

The following policies and procedures support this policy:

- Whistleblower Procedure

## 5 Accountabilities and Responsibilities

<p><b>Board:</b></p>	<p>is the governing body of FSAC Ltd and is therefore ultimately responsible for ensuring the proper and effective management and operation of the FSAC organisation. The Board is responsible for the overall governance of FSAC Ltd. This includes defining and monitoring the strategic direction, developing and monitoring policies, monitoring the effectiveness of the Board's and the Company's performance, and establishing control and accountability systems.</p>
<p><b>College Councils:</b></p>	<p>are responsible for the administration and implementation of the Strategic Direction, Policies and Procedures and Control and Accountability systems developed by the Board. The College Councils act within the scope of powers delegated to them by the Board and remain accountable to and report regularly to the Board. College Councils:</p> <ul style="list-style-type: none"> <li>• Review, monitor and report on regulatory compliance issues, including recommending action and remediation plans to the Board;</li> <li>• Review major risks that their respective college is, or is likely to be exposed to; and</li> <li>• Monitor risk management strategies.</li> </ul>
<p><b>Principal:</b></p>	<p>is held accountable for the effective management of their College including the maintenance of all accreditation compliance requirements. The Principals are responsible to the Board for leading the Colleges to deliver high quality curriculum and educational outcomes, excellence in teaching and learning, strong College communities and driving the agenda for building the Colleges' market growth. The Principals work closely with the College Councils in the management of the College. The Principals report to the Board through the College Council.</p>
<p><b>Business Manager/ Company Secretary</b></p>	<p>is responsible for ensuring FSAC Ltd achieves its financial aims through the application of best practice financial principles and complying with financial, accounting and ASIC reporting requirements.</p>
<p><b>Manager, Human Resources and Compliance:</b></p>	<p>is responsible for ensuring the FSAC Ltd organisation achieves its strategic objectives through the development and application of best practice human resource management principles and practice which comply with employment law, industrial relations and work health and safety requirements and which minimise corporate risk exposure to human resource related issues by ensuring</p>

	that a comprehensive Board and operational policy framework is in place and compliant with statutory requirements.
Staff Members:	employed by the FSAC Colleges, including staff who are employed subject to the Enterprise Bargaining Agreement or other industrial instrument are responsible for adhering to all organisational policies and procedures.

## 6 Managing this policy

This policy is to be reviewed every three years from the date of approval. Notwithstanding the scheduled review, should any circumstance change materially before the review period, the policy will be immediately reviewed in order to maintain appropriate accuracy, relevance and authority.

## Appendix One

### Legal and Other Reference Material

- *Anti-Discrimination Act 1999* (Qld)
- *Australian Standard AS8004-2003 – Whistleblower Protection Program for entities*
- *Banking Act 1959* (Cth)
- Our Commitment: Creating environments for children and young people to thrive CODE OF CONDUCT for Anglican Schools and Education & Care Services
- *Corporations Act 2001* (Cth)
- *Education for Oversea Students Act 2000* (Cth)
- *Education for Overseas Students Regulations 2001* (Cth)
- *Information Privacy Act 2009* (Cth)
- *Insurance Act 1973* (Cth)
- *Life Insurance Act 1995* (Cth)
- National Code of Practice for Providers of Education and Training to Overseas Students
- *Privacy Act 1988* (Cth)
- *Superannuation Industry (Supervision) Act 1993* (Cth)
- *Taxation Administration Act 1953* (Cth)
- *Right to Information Act 2009*
- *Work Health and Safety Act 2011* (Qld)
- *Work Health and Safety Regulations 2011* (Qld)