Section 1: Organisational Framework

Policy 1.4 Whistleblower Policy

POLICY STATEMENT

EdConnect Australia is committed to fostering a culture of legal, ethical and moral behaviour and exemplary corporate governance. We recognise the value of transparency and accountability in our administrative and management practices and support the reporting of improper conduct.

This whistleblower policy has been developed so that people can raise concerns where they believe that EdConnect Australia or anybody connected with the organisation has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct, as set out below.

1. Purpose

This Policy aims to:

a) encourage a person to report potential misconduct in good faith if they have reasonable grounds to suspect such conduct

b) provide a mechanism to report misconduct or dishonest or illegal activity that has occurred or is suspected to have occurred

c) enable EdConnect to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for secure storage of the information

d) ensure that any disclosures are dealt with appropriately and in a timely manner

e) ensure that individuals who disclose potential misconduct can do so safely, securely and with confidence that they will be protected and supported by EdConnect, and

f) help to ensure that EdConnect maintains the highest standards of ethical behaviour and integrity and is compliant with the law.

2. Definitions

Eligible Whistleblower	Someone with inside knowledge of an organisation who reports misconduct or dishonest or illegal activity that may have occurred within that organisation. It can be someone who is or was: • an EdConnect officer or employee • an individual or an employee of a person that supplies services or goods to EdConnect (including volunteers) • an individual who is an EdConnect associate • a relative or dependant of any of the above, or a dependant of the spouse of any of the above. and to whom whistleblower Protection may apply
Protection	A whistleblower is entitled to protection under the Corporations Act if they make a Qualifying Disclosure to an Eligible Recipient.

	To qualify for protection, the whistleblower must have reasonable grounds to suspect that the information they will disclose indicates misconduct. An eligible whistleblower can remain anonymous and still qualify for protection.
Eligible Recipient	an individual who receives a Disclosure and includes: • an officer or senior manager of EdConnect • an auditor or member of the EdConnect audit team • a person that EdConnect has authorised to receive a disclosure (this can include a person external to the charity). • a legal practitioner, if someone is seeking legal advice about whether the protections will apply to them • the Australian Securities and Investment Commission (ASIC) • a Commonwealth body nominated for this purpose in the Regulations (this does not include the ACNC) To qualify for protection, a whistleblower must make their disclosure to an Eligible Recipient.
Qualifying Disclosure	A qualifying disclosure is a report of a suspected serious wrongdoing that a person reasonably believes is true or likely to be true. It involves reporting conduct by EdConnect or an officer or employee of EdConnect that represents misconduct, an improper state of affairs or circumstances, or breach of the law. This can include conduct that: • contravenes the Corporations Act, or the ASIC Act • constitutes an offence against another Commonwealth law that is punishable by imprisonment for 12 months or more • represents a danger to the public or the financial system, or • is prescribed by the Regulations.

3. Scope

This policy applies to EdConnect Australia and its Officers, Directors and Employees. It sets out EdConnect's response to any potential Qualifying or Protected Disclosure received, including how the organisation will meet its obligations to any person making such a disclosure.

4. Principles

Higher standard

If anything in this Policy is inconsistent with any law imposed on the organisation, that legal obligation or the "higher standard" will prevail over this Policy.

Speak up and report it!

We encourage people working with or for EdConnect to report any concerns in line with our policies and procedures.

Our expectations

EdConnect expects people to act honestly and ethically, and to ensure any report of potential misconduct is made on reasonable grounds.

5. EdConnect's Commitment

EdConnect commits to meeting its obligations to Whistleblowers by:

- informing and training officers, employees and volunteers on the policy.
- maintaining confidentiality of a whistleblower's identity including any information that may be used to identify them except where their identity is disclosed to:
    - an authorised regulatory authority
    - EdConnect's appointed legal adviser for the purpose of seeking legal advice
    - any person or entity with the whistleblower's consent
    - a body as prescribed by legislation.
- preventing EdConnect, or any of its officers or employees, from causing detriment to or victimisation of a whistleblower.
- maintaining this whistleblower policy.
- publishing the policy on the EdConnect website

6. What can be reported under this policy

A person may disclose any information that the person has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances in relation to EdConnect, including any past, present or likely future activity, behaviour or state of affairs considered to be:

- dishonest;
- corrupt (including soliciting, accepting or offering a bribe, or facilitating payments or other such benefits);
- fraudulent;
- illegal (including theft, drug sale or use, violence or threatened violence, or property damage);
- in breach of regulation, internal policy or code (such as EdConnect's Code of Conduct);
- improper conduct relating to accounting, internal controls, compliance, actuarial, audit or other matters of concern to the whistleblower;
- a serious impropriety or an improper state of affairs or circumstances;
- endangering health or safety;
- damaging or substantially risking damage to the environment;
- serious mismanagement of EdConnect's resources;
- detrimental to EdConnect's financial position or reputation;
- maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives);
- concealing potential misconduct;
- causing detriment to or victimsation of an actual or potential whistleblower.

A person may also disclose any information that the person has reasonable grounds to suspect concerns misconduct in relation to the actions of a third party, such as a funder, customer/client, supplier or service provider.

7. What cannot be reported under this policy

EdConnect's whistleblower policy provisions do not apply to the reporting of:

- complaints by customers/clients or partners about a service
- personal volunteer or work-related grievances unless the grievance includes victimisation due to whistleblowing.

These matters are dealt with under other policies.

8. Who Can a Matter be Reported to

A Qualifying Disclosure may only be made to an Eligible Recipient.

Eligible Whistleblowers are strongly encouraged to make a disclosure to an Eligible Recipient within EdConnect in the first instance, by contacting:

- the Chief Executive Officer
- a Manager
- the Board Chair
- a Director

A whistleblower may report to a parliamentarian or journalist on specific emergency or public interest grounds and in compliance with the relevant provision of the Corporations Act. EdConnect suggests individuals seek legal advice prior to reporting under these circumstances.

9. Investigation of Whistleblower Report

To make a Qualified Disclosure there must be reasonable grounds to suspect misconduct, or an improper state of affairs or circumstances in relation to EdConnect.

For a Qualified Disclosure to be investigated, it must contain sufficient information to form a reasonable basis for an investigation.

It is important that as much information as possible is provided. This includes any known details about the events underlying the report such as the:

- date
- time
- location
- name of person(s) involved
- possible witnesses to the events
- evidence of the events (e.g. documents, emails)

Any steps taken to report the matter elsewhere or to resolve the concern should be included.

10. Confidentiality

EdConnect encourages any whistleblower to identify themselves when reporting misconduct as this can assist in gathering further information and investigations. Where a whistleblower chooses to report anonymously such as by adopting a pseudonym, they may remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. EdConnect will do all it can to protect confidentiality.

Measures will be taken to protect identity such as redacting personal information, storing information and disclosures securely, referring to the whistleblower in a gender-neutral context and only allowing qualified and/or EdConnect's most senior officer/s to investigate disclosures.

A company or organisation that receives a whistleblower report can be asked to keep the discloser's identity, or information that is likely to lead to the discloser's identification, confidential.

EdConnect will not disclose identifying information without the discloser's consent.

However, EdConnect may report the information to, for example, ASIC or the Australian Federal Police, or to a lawyer for advice about the whistleblower protections. There may also be circumstances where EdConnect is required to disclose the information to a court or tribunal, where the court or tribunal considers it necessary in the interests of justice or to give effect to the whistleblower provisions in the Corporations Act.

It is illegal for a person to reveal the identity of a whistleblower, or information likely to lead to the identification of a whistleblower, outside of these circumstances.

If a person feels their confidentiality has been breached, a complaint can be lodged with EdConnect, a regulator, such as ASIC, for investigation.

EdConnect may take disciplinary action against individuals that breach the confidentiality of a whistleblower, including summary dismissal.

11. Protections

EdConnect Australia will support and protect whistleblower/s and anyone else assisting in the investigation of a Qualifying Disclosure and will not tolerate any detriment inflicted on a person who has made, or might make, a report of potential misconduct.

Examples of a detriment include:

a) retaliation, dismissal, suspension, demotion, or termination of your role
b) bullying, harassment, threats, or intimidation
c) discrimination, subject to current or future bias, or derogatory treatment
d) harm or injury
e) damage or threats to your property, business, financial position or reputation or revealing your identity as a Whistleblower without your consent or contrary to law
g) threatening to carry out any of the above actions.

This protection applies regardless of whether any concerns raised are found to be true, provided that the whistleblower is acting honestly and ethically and made the Qualifying Disclosure on

reasonable grounds. Protection also applies to individuals conducting, assisting or participating in an investigation. A person is also entitled to this protection from EdConnect if making a report of potential misconduct to an external body under this Policy.

Any person who believes they have suffered a detriment in violation of this Policy, is encouraged to report this immediately to an officer or senior manager at EdConnect or an alternative Eligible Recipient under this Policy. Concerns of being disadvantaged will be treated as a report of misconduct in line with this Policy.

Anyone found to be victimising or disadvantaging another individual for making a Qualified Disclosure under this Policy may be disciplined and/or face summary dismissal and may also be subject to legal action and face criminal or civil penalties.

A whistleblower may also be entitled to the following legal protections:

a) protection from civil, criminal or administrative legal action
b) protection from having to give evidence in legal proceedings and/or
c) compensation or other legal remedy.

12. Investigation of a Disclosure

When a disclosure is received, EdConnect Australia will endeavour to assess the disclosure to determine whether:

a) it qualifies for protection; and
b) a formal, in-depth investigation is required

Depending upon requirements for confidentiality, EdConnect will ensure an appropriate person is tasked with investigating the matter and/or that the matter is referred to a regulator or EdConnect's legal representative where external expertise and advice is required.

EdConnect will aim to follow the principles of natural justice in its investigations as far as is practicable given confidentiality constraints.

An investigation may not be able to progress if EdConnect is unable to contact the whistleblower.

EdConnect Australia will endeavour to provide the whistleblower with regular updates on progress of the investigation.

13. Related Procedures

Policy Number	Policy Name
1.1	Framework to Safeguard Children and Young People
1.3	Risk Management Policy
3.2	Code of Conduct - Board
4.7	Code of Conduct – Staff
5.5	Code of Conduct – Volunteers

8.1	Principles of Financial Management
8.2	Financial Controls Policy and Procedures
9.6	Privacy and Confidentiality

14. Legislation and other guidance

Corporations Act 2001 (Cth)
ASIC Corporations (Whistleblower Policies) Instrument 2019/1146
ASIC Regulatory Guide 270 - Whistleblower Policies
Taxation Administration Act 1953 (Cth)
Australian Charities and Not for Profit Commission Guidance and Factsheets

15. Monitoring & Review of Policy

Version	2
Date Created:	August 2023
Date of Reviews	
Date of last Review:	September 2026
Date for next Review:	September 2029

Reviewed/Endorsed by the Board of Directors

Meeting Date: 17 September 2026

Name: Sabine Dejey

Signed



Chair, Board of Directors