



VILLANOVA COLLEGE



WHISTLEBLOWER PROTECTION PROCEDURES

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PURPOSE AND RELATIONSHIP TO POLICY

These procedures give practical effect to the Villanova College Whistleblower Protection Policy (the Policy). They set out the step-by-step process for making, receiving, investigating and concluding a whistleblower disclosure. They should be read alongside the Policy and in accordance with the obligations imposed on the College by the *Corporations Act 2001 (Cth)* and the *Taxation Administration Act 1953 (Cth)*.

STEP 1: MAKING A DISCLOSURE

Who to contact

A Worker who wishes to make a disclosure should contact the Whistleblower Protection Officer (WPO), Deputy Principal or Director of HR.

If the disclosure involves allegations against the Principal, it must be directed to the Chair of the College Board rather than the WPO or Principal.

A Worker may also contact the WPO to seek general information about this policy - how it works, what it covers, and how a disclosure would be handled - without making a formal disclosure. These conversations are confidential.

How to submit a disclosure

Disclosures should be submitted in writing and marked Confidential. The preferred channels are:

- **Disclosures not involving the Principal:** Addressed to the Whistleblower Protection Officer, Villanova College, PO Box 1166 Coorparoo DC QLD 4151, marked Confidential.
- **Disclosures involving the Principal or a Director:** Addressed to the Chair of the Villanova College Board of Directors, PO Box 1166 Coorparoo DC QLD 4151, marked Confidential.

Disclosures may be made anonymously. A Whistleblower may use a pseudonym and is under no obligation to identify themselves at any stage. Where a disclosure is made anonymously and the College cannot contact the Whistleblower, the investigation will proceed based on the information provided.

What to include

The disclosure should include as much of the following information as is available and safe to provide:

- A description of the conduct or circumstances of concern, including dates, times and location where known.
- The names or roles of persons involved, where known.
- Details of any witnesses to the relevant events.
- Any supporting evidence available, such as documents, emails or records.
- Any steps already taken to report or resolve the matter, and the outcome of those steps.
- A contact method, if the Whistleblower is willing to be contacted (even via an anonymous channel).

A Whistleblower is not required to provide all of this information to qualify for protection. The more information provided, however, the more effectively the College can investigate.



STEP 2: RECEIPT AND INITIAL ASSESSMENT

Acknowledgement

Upon receiving a disclosure, the WPO will acknowledge receipt to the Whistleblower within five business days where the Whistleblower can be contacted. Where a disclosure is made anonymously but a contact channel is provided, the WPO will use that channel to acknowledge receipt.

Initial assessment

Within five business days of receiving a disclosure, the WPO will complete an initial assessment to determine:

- whether the disclosure falls within the scope of the Policy and qualifies for protection;
- whether there are any conflicts of interest that must be managed before proceeding;
- whether external regulatory bodies (such as ASIC, APRA or the Australian Federal Police) need to be notified at this stage; and
- whether a formal investigation is warranted.

Where the WPO has a conflict of interest in relation to the disclosure, they must immediately notify the Principal (or the Chair of the Board if the conflict involves the Principal), who will arrange for an alternative person to conduct the assessment and any subsequent investigation.

Where the disclosure does not qualify for protection under the Policy, or initial assessment reveals no case to answer, the Whistleblower will be notified as soon as possible and advised of any alternative reporting pathway that may be appropriate (such as the Grievance and Dispute Resolution Policy).

Where the disclosure qualifies for protection and a formal investigation is required, the WPO will proceed to Step 3.

Immediate risk assessment

At the same time as the initial assessment, the WPO will assess whether the Whistleblower faces any immediate risk of detriment as a result of having made the disclosure. Where a risk is identified, the WPO will implement protective measures without delay. These may include:

- permitting the Whistleblower to perform their duties from an alternative location;
- temporarily reassigning or relocating other staff involved in the relevant matter;
- adjusting reporting lines or access arrangements as a precautionary measure; or
- referring the Whistleblower to the Employee Assistance Program (EAP) for confidential support.

STEP 3: INVESTIGATION

Appointing the investigator

Where a formal investigation is required, the WPO will appoint a Whistleblower Investigation Officer (WIO). The WIO must be independent of the Whistleblower, the Respondent and the business unit involved in the disclosure. The WIO may be an internal or external person.

The College will engage an external investigator where:

- the allegations are of a serious or sensitive nature;
- specialist technical, financial or legal expertise is required; or
- the WPO or Principal determines that independence or objectivity is best served by external appointment.



The appointment of a WIO requires the consent of the Whistleblower where their identity is known.

Investigation scope and planning

Before commencing the investigation, the WPO and WIO will agree on:

- the nature and scope of the investigation;
- the persons to be interviewed or contacted;
- the documents and evidence to be gathered and how they will be preserved;
- any external parties, such as ASIC or the Australian Federal Police, whose involvement should be considered; and
- a target timeframe for completion, having regard to the complexity of the matter.

Conducting the investigation

The investigation will be conducted thoroughly, objectively and fairly. The WIO will:

- Obtain the full details of the allegations in writing.
- Take immediate steps to identify and preserve relevant evidence, including documents, records and correspondence.
- Notify the Respondent in writing that a disclosure has been made and provide them with a fair opportunity to respond to the allegations before any adverse finding is made. The notification will be carefully framed to avoid identifying the Whistleblower.
- Interview relevant witnesses and other parties as required.
- Assess all evidence gathered on a fair and objective basis.
- Maintain comprehensive records of each step in the investigation process.
- Report progress to the WPO within seven days of appointment and at least every 14 days thereafter.

Only personnel directly involved in managing or investigating the disclosure will be made aware of the Whistleblower's identity or information likely to lead to their identification. Information about the investigation will not be shared beyond those directly involved without authorisation from the WPO.

Keeping the Whistleblower informed during the investigation

The WPO will keep the Whistleblower informed throughout the investigation where contact is possible. At a minimum, the Whistleblower will receive a written update at least every three months while the investigation is in progress. Updates will confirm that the investigation is proceeding and provide any other relevant information that can be shared without compromising the investigation or the privacy of any other person.

A Whistleblower may, at any time during the investigation, decline to answer questions or provide further information that they believe could reveal their identity.

STEP 4: OUTCOME AND REPORTING

Investigation report

At the conclusion of the investigation, the WIO will prepare a written investigation report for the WPO. The report will set out:

- a finding of all relevant facts established during the investigation;
- a determination as to whether each allegation has been substantiated, not substantiated or remains inconclusive;



- recommended action, which may include referral to external authorities, disciplinary action, process improvements or no action; and
- recommendations to prevent future instances of similar conduct.

The investigation report must not disclose the identity of the Whistleblower, or include information likely to lead to their identification, unless the Whistleblower has consented to this in writing.

Decision and action

The Principal or Chair of the College Board (as appropriate) will consider the investigation report and determine the action to be taken. Where the allegations are substantiated, the response will be proportionate to the severity, nature and circumstances of the Reportable Conduct and may include:

- formal disciplinary action, up to and including termination of employment or engagement;
- referral to ASIC, APRA, the Commissioner of Taxation, the Australian Federal Police or another relevant authority;
- changes to College policies, procedures or controls; or
- no further action, where the evidence does not support the allegations.

Notifying the Whistleblower of the outcome

Where the Whistleblower can be contacted, the WPO will inform them that the investigation has concluded and provide a general summary of the outcome to the extent that this is appropriate, having regard to the privacy of the Respondent and any other legal obligations. A copy of the investigation report will not be provided to the Whistleblower.

Notifying the Respondent of the outcome

The Respondent will be informed of the outcome of the investigation. They will not be provided with a copy of the investigation report and will not be given information that could identify the Whistleblower. Where the allegations are not substantiated, the Respondent will be informed accordingly and the matter will be treated as closed.

Board reporting

The Principal will report to the Board of Directors at each Board meeting on the existence and status of any whistleblower disclosures and the outcomes of completed investigations, to the extent necessary to enable the Board to address any risk or governance issues at the College. Where a disclosure relates to serious or material misconduct, the Principal will notify the Board immediately rather than waiting for the next scheduled meeting.

Board reports must not disclose the identity of the Whistleblower, or include information likely to lead to their identification, without the Whistleblower's written consent.

Review of investigation

A Whistleblower who is not satisfied with how the College has handled their disclosure may lodge a complaint with an external regulator such as ASIC or APRA for independent review.

PROTECTING THE WHISTLEBLOWER THROUGHOUT

Ongoing detriment monitoring

The WPO is responsible for monitoring the risk of detriment to the Whistleblower throughout the investigation and for a reasonable period after its conclusion. The WPO will check in with the Whistleblower at each scheduled update point, and at any other time where circumstances suggest a risk of detriment may have arisen or increased.



Any allegation by a Whistleblower that they have suffered detriment will be treated as a separate disclosure of Reportable Conduct and investigated accordingly. The WPO will report such allegations to the Principal or Chair of the Board immediately.

Support services

At any point during or after the process, the WPO may refer the Whistleblower to the Employee Assistance Program (EAP) for confidential counselling and professional support. Current EAP contact details are maintained on the Staff Portal. The WPO will also provide practical strategies to assist the Whistleblower to manage any stress, performance impacts or other challenges arising from the disclosure or investigation.

Identity protection during the investigation

The WPO will take specific measures throughout the investigation to protect the Whistleblower's identity, including:

- referring to the Whistleblower in gender-neutral terms in all internal communications;
- redacting identifying information from any documents shared with the WIO or other parties;
- restricting access to investigation records to those with a direct and necessary role in the process; and
- ensuring that communications and documents relating to the investigation are not sent to email addresses or printers accessible by staff not involved in the investigation.

RECORDS AND CONFIDENTIALITY

The WPO will maintain a secure, confidential register of all disclosures received and the status and outcome of each investigation. The register will be accessible only to the WP Team and, where relevant, those directly involved in the investigation.

All electronic and physical records relating to a disclosure or investigation will be stored securely. Physical records will be held in locked storage. Electronic records will be stored in a protected system with access restricted to authorised personnel.

Records will be retained in accordance with the College's record-keeping obligations under applicable legislation. Where a matter has been referred to an external authority, records will be retained until that authority confirms the matter is closed.

Any person who accesses, uses or discloses records relating to a whistleblower disclosure other than in accordance with these procedures may be subject to disciplinary action and, where applicable, criminal or civil penalties under the *Corporations Act 2001 (Cth)*.

ABUSE OF THE DISCLOSURE PROCESS

The College encourages Workers to report concerns about Reportable Conduct and will not penalise anyone for making a disclosure in good faith. However, these procedures are not intended to be used to make deliberate false disclosures, frivolous or vexatious disclosures, or to disguise personal or professional grievances as Protected Disclosures.

A person who makes a disclosure knowing it to be false, or who misuses the disclosure process, will not be entitled to the protections under this policy or the *Corporations Act 2001 (Cth)*, and may be subject to disciplinary action proportionate to the nature and circumstances of the conduct.

False or vexatious disclosures can cause serious harm to the reputation and wellbeing of those named in them. The College treats such conduct seriously.



MONITORING AND TRAINING

Monitoring effectiveness

The WP Team will monitor these procedures and the operation of the Whistleblower Program on an ongoing basis. This includes tracking the number and nature of disclosures received, the timeliness of assessments and investigations, the outcomes achieved and any patterns or systemic issues identified through disclosures.

The WP Team will report to the Board at least annually on the effectiveness of the whistleblower program, including any recommended improvements. These procedures will be reviewed in full every two years, or earlier as required.

Training

The Principal will ensure that targeted training is provided to the WP Team and all persons who may be involved in receiving, managing or investigating disclosures. Training will address the legal obligations of the College and individuals under the *Corporations Act 2001 (Cth)*, the requirements of this policy and these procedures, and the practical handling of disclosures with appropriate sensitivity and confidentiality.

Human Resources will ensure that all Workers are made aware of this policy and their rights and obligations under it as part of the induction process, and that awareness is refreshed periodically.

This policy and these procedures will be made available to all staff on the College's Staff Portal and external website. A copy will be provided to the College's external auditor.

These procedures are not intended to override any industrial instrument, contract, award or applicable legislation. Once printed this is a non-controlled copy.



ACCOUNTABILITY

Role	Responsible For
Board of Directors	Oversight and review of these procedures
Principal	Implementation, compliance, and reporting
Whistleblower Protection Officer (WPO)	Receiving disclosures, managing investigations, and protecting Whistleblower welfare
Director of HR	Policy review and updates, and training compliance
Whistleblower Investigation Officer (WIO)	Conducting investigations and reporting findings
All Workers	Compliance with this policy and these procedures

ASSOCIATED DOCUMENTS

Description	Document Type
Villanova College Whistleblower Protection Procedures	Procedure
Villanova College Code of Conduct	Policy
Villanova College Grievance and Dispute Resolution Policy	Policy
Villanova College Privacy Policy	Policy
Villanova College Conflict of Interest Policy	Policy

RELEVANT LEGISLATION

The following legislation and standards are relevant to this policy:

- *Corporations Act 2001 (Cth)*
- *Taxation Administration Act 1953 (Cth)*
- *Fair Work Act 2009 (Cth)*
- *Public Interest Disclosure Act 2013 (Cth)*

REVIEW AND APPROVAL

This policy will be reviewed at least every two years or earlier if required by legislation, system change, or College operations.

Version	Review	Author/s	Authorisation	Approval Date	Next Review
1.0	Updated formatting aligned to Villanova Green & Gold branding; content updated for digital learning and AI references.	Director of HR	Principal	May 2026	2028