RUTHERGLEN KINDERGARTEN WHISTLEBLOWER

QUALITY AREA 7 | ELAA version 1.0

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PURPOSE

This policy is a vital tool help Rutherglen Kindergarten identify wrongdoing that may not be uncovered unless there is a safe and secure way to disclose it.

The purpose of this policy is to:

- encourage genuine concerns about possible wrongdoing *(refer to Definitions)* in relation to Rutherglen Kindergarten to be raised as soon as possible
- provide guidance on how to raise those concerns, how they will be investigated and the support available to individuals raising concerns under this policy
- ensure that any wrongdoing *(refer to Definitions)* is identified and dealt with appropriately
- ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported, and
- comply with the legislative requirements under the Corporations Act and the Taxation Administration Act to ensure statutory protection is afforded to anyone who makes a Protected Report *(refer to Definitions)*.

Nothing in this policy is intended to change or take away any other protections which may be available under law. If there is inconsistency between this policy and the provision of relevant legislation, the provisions of the relevant legislation will apply to the extent of the inconsistency.

POLICY STATEMENT

VALUES

Rutherglen Kindergarten 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 'speak up' and report improper, unethical, or illegal conduct.

SCOPE

This policy applies to the approved provider, persons with management or control, nominated supervisor, persons in day-to-day charge, early childhood teachers, educators, staff, students, volunteers, parents/guardians and children.

RESPONSIBILITIES	Approved provider and persons with management or control	Whistleblower Protection Officer(s)	Whistleblower Investigators	Staff	Contractors, parents, volunteers and students
R indicates legislation requirement, and should not be deleted					
Nominating a staff member/s as Whistleblower Protection Officer(s)	√				
Assisting the Whistleblower Protection Officer(s) in the assessment and oversight of whistleblower reports *(refer to Attachment 1)*	√				
Providing advice and support to reporters *(refer to Attachment 1)*	√				
Maintaining a secure and restricted record of all reports made under this Policy	√	√	√		
Arranging role-specific training as and when required	√				
Ensuring staff are made aware of their rights and responsibilities in relation to whistleblowing at induction	√				
Ensuring staff are regularly encouraged to speak up about concerns of wrongdoing *(refer to Definitions)*	√	√			
Receiving whistleblower reports and protecting the interests of reporters *(refer to Attachment 1)*		√			
Determining whether the report falls within the scope of the Policy *(refer to Attachment 1)*		√			
Appointing a Whistleblowing Investigator where an investigation is deemed appropriate	√				
Ensuring investigations are conducted in accordance with this Policy *(refer to Attachment 1)*	√	√			
Ensuring any reports involving the approved provider are reported to the Australian Securities and Investments Commission *(refer to Sources)*		√			
Updating the reporter/s on progress and details of outcomes to the fullest extent possible		√			
Maintaining confidentiality of the identity of and reports received by reporters to the fullest extent possible		√			
Immediately reporting concerns in relation to any detrimental conduct to the approved provider (provided that the concerns do not relate to		√			

them)					
Determining the appropriate courses of action to remediate or act on the investigation *(refer to Attachment 1)*		√			
Reporting matters to relevant authorities e.g. ASIC or APRA *(refer to Attachment 1)*		√			
Making recommendations to prevent future instances of reportable misconduct		√			
Completing any training mandated by approved provider		√			
Seeking to ensure the integrity of the Whistleblower Program is maintained		√			
Investigating reports in accordance with this Policy *(refer to Attachment 1)*			√		
Gathering evidence and taking steps to protect or preserve evidence			√		
Making findings based on a fair and objective assessment of the evidence gathered during the investigation, and formalising this in a report			√		
Reporting back to the Whistleblower Protection Officer on the progress of their investigation 7 days after the report and every 14 days thereafter			√		
Complying with the directions of the Whistleblower Protection Officer in relation to any further follow up, and reporting action and requirements, including the implementation of any recommendations			√		
Reporting misconduct or dishonest or illegal activity that has occurred or is suspected within Rutherglen Kindergarten as quickly as possible, whether anonymously or otherwise				√	√

BACKGROUND AND LEGISLATION

BACKGROUND

Whistleblowers play an important role in identifying and calling out misconduct and harm to consumers and the community. To encourage whistleblowers to come forward with their concerns and protect them when they do, the Corporations Act 2001 gives certain people legal rights and protections as whistleblowers.

From 1 January 2020, some entities in Australia, including companies limited by guarantee, will be required to have a whistleblowing policy that complies with the new section 1317AI of the Corporations Act 2001.

ASIC has announced that public companies that are small not-for-profits or registered charities with annual revenue of less than $1 million will be exempt from the new requirement.

Even if your service is not required to have a whistleblower policy under the law, we encourage you to put in place arrangements for handling whistleblower disclosures. This can help your service comply

with the obligation to preserve whistleblowers' confidentiality and protect whistleblowers from detrimental conduct. These arrangements may form part of the governance arrangements.

LEGISLATION AND STANDARDS

Relevant legislation and standards include but are not limited to:

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)
- Insurance Act 1973
- Life Insurance Act 1995
- Public Interest Disclosure Act 2013
- Superannuation Industry (Supervision) Act 1993
- Taxation Administration Act 1953

The most current amendments to listed legislation can be found at:

- Victorian Legislation – Victorian Law Today: www.legislation.vic.gov.au
- Commonwealth Legislation – Federal Register of Legislation: www.legislation.gov.au

DEFINITIONS

The terms defined in this section relate specifically to this policy. For regularly used terms e.g. Approved provider, Nominated supervisor, Notifiable complaints, Serious incidents, Duty of care, etc. refer to the Definitions file of the PolicyWorks catalogue.

Protected Report: To be eligible for the legal protections outlined in this policy, you must:

- be an eligible whistleblower *(see Definitions)*
- report your concerns to an eligible recipient or certain other persons *(see Definitions)*, and
- have reasonable grounds to suspect wrongdoing *(see Definitions)* in relation to the service.

If your report meets all three of the above these criteria, it is a Protected Report.

Whistleblower: You are an eligible whistleblower if you are currently, or previously have been, either:

- An approved provider of the service
- an employee of the service, including any volunteers and work experience students
- a person who supplies goods or services to the service, whether paid or unpaid, or an employee of such a person, or
- a spouse, relative or dependent of a person referred to above.

Wrongdoing: Generally includes any conduct which an eligible whistleblower has reasonable grounds to suspect:

- is about misconduct or an improper state of affairs or circumstances concerning the service
- indicates that service or any of its approved provider or employees has engaged in conduct that:
    - involves a breach of or is an offence against any of the following Commonwealth laws: the Corporations Act, the ASIC Act, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 1973, or the Superannuation Industry (Supervision) Act 1993, or regulations made under those laws
    - is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more
    - indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law

- is indicative of systemic issues, dishonest or unethical behaviour or practices
- is about misconduct or an improper state of affairs or circumstances in relation to the tax affairs of the service which the whistleblower considers may assist to perform the functions or duties in relation to the tax affairs of the service, or
- involves the deliberate concealment of information tending to show any of the matters listed above.

Examples of the types of matters that may be reportable as Wrongdoing as part of a Protected Report include, but are not limited to:

- Dishonesty, corruption, bribery, fraud, money laundering or misappropriation of funds
- Offering or accepting a bribe
- Covering up fraud in financial reports
- Unsafe work practices
- Not properly responding to a serious safety issue
- Insider trading
- Serious inappropriate or unethical conduct such as gross mismanagement or serious and substantial waste of company resources or repeated breaches of administrative procedures
- Taking or threatening to take detrimental action against a person who has made a disclosure or is suspected to have made, or planning to make a disclosure, and
- Deliberate concealment of information tending to show any of the matters listed above.

Generally, Wrongdoing does not include personal work-related grievances.

SOURCES AND RELATED POLICIES

SOURCES

- Australian Prudential Regulation Authority (APRA): www.apra.gov.au
- Australian Securities and Investments Commission (ASIC): www.asic.gov.au
- Your Call: https://whistleblowing.com.au/
- Not For Profit Law: https://www.nfplaw.org.au/free-resources/how-to-run-the-organisation/whistleblower-protection-laws

RELATED POLICIES

- Code of Conduct
- Compliments and Complaints
- Governance and Management of a Service

EVALUATION

In order to assess whether the values and purposes of the policy have been achieved, the approved provider will:

- regularly seek feedback from everyone affected by the policy regarding its effectiveness, particularly in relation to identifying and responding to child safety concerns
- monitor the implementation, compliance, complaints and incidents in relation to this policy
- keep the policy up to date with current legislation, research, policy and best practice
- revise the policy and procedures as part of the service's policy review cycle, or as required
- notifying all stakeholders affected by this policy at least 14 days before making any significant changes to this policy or its procedures, unless a lesser period is necessary due to risk *(Regulation 172 (2))*.

ATTACHMENTS

- Attachment 1. Making a whistleblower report

ATTACHMENT 1. MAKING A WHISTLEBLOWER REPORT

1. What reports are protected under this policy?

To be eligible for the legal protections outlined in this policy, you must:

(a) be an eligible whistleblower (see section 2)

(b) report your concerns to an eligible recipient or certain other persons (see section 5), and

(c) have reasonable grounds to suspect Wrongdoing in relation to Rutherglen Kindergarten (see section 3).

If your report meets all three of the above these criteria, it is a Protected Report.

If your report doesn't meet the above criteria, we still encourage you to raise your concerns with us. However, only Protected Reports receive the legal protections outlined in this policy.

2. Who is an eligible whistleblower?

You are an eligible whistleblower if you are currently, or previously have been, either:

(a) an officer of Rutherglen Kindergarten

(b) an employee of Rutherglen Kindergarten, including any volunteers and work experience students

(c) a person who supplies goods or services to Rutherglen Kindergarten, whether paid or unpaid, or an employee of such a person, or

(d) a spouse, relative or dependent of a person referred to above.

3. What must a Whistleblower report be about?

3.1 What is Wrongdoing?

For the report to be a Protected Report, one of the requirements is that the person making the report has reasonable grounds to suspect Wrongdoing is occurring or has occurred. It is not possible to provide an exhaustive list of the activities which should be reported for the purpose of this policy. Generally, Wrongdoing includes any conduct which an eligible whistleblower has reasonable grounds to suspect:

(a) is about misconduct or an improper state of affairs or circumstances concerning Rutherglen Kindergarten;

(b) indicates that Rutherglen Kindergarten or any of its officers or employees has engaged in conduct that:

(i) involves a breach of or is an offence against any of the following Commonwealth laws: the Corporations Act, the ASIC Act, the Banking Act 1959, the Financial Sector (Collection of Data) Act 2001, the Insurance Act 1973, the Life Insurance Act 1995, the National Consumer Credit Protection Act 1973, or the Superannuation Industry (Supervision) Act 1993, or regulations made under those laws,

(ii) is an offence against any other Commonwealth law that is punishable by imprisonment of 12 months or more,

(iii) indicates a significant risk to public safety or the stability of, or confidence in, the financial system, even if it does not involve breach of a particular law, or

(iv) is indicative of systemic issues, dishonest or unethical behaviour or practices;

(c) is about misconduct or an improper state of affairs or circumstances in relation to the tax affairs of Rutherglen Kindergarten or an associated company which the whistleblower considers may assist to perform the functions or duties in relation to the tax affairs of Rutherglen Kindergarten; or

(d) involves the deliberate concealment of information tending to show any of the matters listed above.

These matters are referred to as "Wrongdoing" in this policy.

3.2 Examples of conduct that may be reported as Wrongdoing

Examples of the types of matters that may be reportable as Wrongdoing as part of a Protected Report include, but are not limited to:

Dishonesty, corruption, bribery, fraud, money laundering or misappropriation of funds

(a) Offering or accepting a bribe

(b) Covering up fraud in financial reports

(c) Unsafe work practices

(d) Not properly responding to a serious safety issue

(e) Insider trading

(f) Serious inappropriate or unethical conduct such as gross mismanagement or serious and substantial waste of company resources or repeated breaches of administrative procedures

(g) Taking or threatening to take detrimental action against a person who has made a disclosure or is suspected to have made, or planning to make a disclosure

(h) Deliberate concealment of information tending to show any of the matters listed above.

Generally, Wrongdoing does not include personal work-related grievances. See section 4.

4. What should I do if I have a personal work-related grievance?

(a) We encourage everyone to speak up about concerns. However, reports that relate solely to personal work-related grievances are not generally considered to be Wrongdoing and are therefore not covered by this policy.

(b) Personal work-related grievances typically relate to an individual's current or former employment arrangements, performance, remuneration outcomes or personal circumstances that do not have significant implications for the organisation (for example an interpersonal conflict between you and another employee).

(c) Personal work-related grievances should be internally raised using the *Compliments and Complaints policy*

(d) There may be some instances where a personal work-related grievance also has significant implications for Rutherglen Kindergarten, and in these circumstances the grievance will be treated as Wrongdoing in accordance with this policy. For example, a personal work-related grievance may still qualify for protection if it is bundled with a report of illegal activity or if it includes information about Wrongdoing beyond an individual's personal circumstances, demonstrates a systemic issue within Rutherglen Kindergarten or has significant implications for the organisation. Any report of causing detriment to a person in breach of this policy is also Wrongdoing and will be addressed in accordance with this policy. Section 6.2 provides more information about detriment.

5. Making a Whistleblower report

5.1 How can a Whistleblower report be made?

[option 1 – prioritise reporting internally in the first instance]

(a) We encourage you to report actual or suspected Wrongdoing to us as soon as you become aware of it.

(b) You are encouraged to make a report to one of our Whistleblower Protection Officer. Our Whistleblower Protection Officer is:

Name	Role	Email
Jo Lucas	Kinder Director	j.lucas@glenviewhealth.org.au
Shane Kirk	CEO	s.kirk@glenviewhealth.org.au

5.2 Can I remain anonymous when making a report?

(a) You can remain anonymous when making a Protected Report. There is no requirement to provide your name or identify yourself at any stage during the reporting or investigation process. You can also decide not to answer questions that you feel may reveal your identity. You can also choose to provide your identity to the person that you are making the report to but not consent to them sharing your identity with anyone else.

(b) We will respect your right not to identify yourself. However, if you choose to remain anonymous, this may affect the ability of Rutherglen Kindergarten to investigate and properly communicate with you about the report.

(c) Rutherglen Kindergarten encourages disclosers who would prefer to remain anonymous to maintain ongoing two-way communication with Rutherglen Kindergarten so that Rutherglen Kindergarten can ask follow-up questions and provide feedback.

5.3 Disclosure to be made with reasonable grounds

(a) To obtain whistleblower protection under the legislation, the report must be made with reasonable grounds. An eligible whistleblower will have 'reasonable grounds' to suspect that something constitutes or potentially constitutes Wrongdoing if they have some factual basis for their suspicion which, in light of the circumstances and context, provides reasonable grounds for that suspicion. Motive is not relevant to determining whether the disclosure is eligible for protection.

(b) You do not need to prove the allegations, but you are encouraged to provide evidence in support of your disclosure if it is safely available. An eligible whistleblower can still qualify for protection even if their Protected Report turns out to be incorrect or unsubstantiated provided they have a reasonable basis for making the report.

5.4 False reporting

False reporting will be treated seriously. If we find that you have intentionally made a false report (for example, if you know a report is untrue and you report it to harm, annoy, or cause distress to someone), we may take disciplinary action against you, which may include termination of your employment or engagement with us.

6. Protection and support available to Whistleblowers

If you make a Protected Report, you are entitled to the benefit of certain protections in accordance with the Corporations Act or the Taxation Administration Act. These protections do not prevent whistleblowers from being liable for any involvement in the Wrongdoing that is the subject of the Protected Report.

6.1 Protecting the Whistleblower's identity

(a) If you make a Protected Report, your disclosure will be treated as confidential in accordance with legal requirements.

(b) If you make a Protected Report, it is illegal for a person to disclose your identity or information that is likely to lead to identification of your identity, unless:

(i) you give your consent

(ii) the disclosure is required by law, or

(iii) the disclosure is made to:

(A) a professional legal advisor (including Rutherglen Kindergarten's legal team) for the purpose of obtaining legal advice or representation, or

(B) authorised regulatory bodies, such as ASIC, APRA or a member of the Australian Federal Police.

(c) However, a person who is dealing with a Protected Report may disclose information that is reasonably necessary for the purposes of investigating the report. If this happens, reasonable steps will be taken to reduce the risk that you will be identified as a result of the report (for example by removing your personal information or other details that are likely to identify you).

(d) To maintain confidentiality of a Whistleblower's identity, Rutherglen Kindergarten will:

(i) ensure personal information or references to the Whistleblower's identity is redacted in all investigation and reporting documents

(ii) refer to the Whistleblower in gender-neutral terms

(iii) ensure that the information a Whistleblower provide and all materials relevant to a Protected Report are held securely with access limited only to the individuals necessary to investigate your Protected Report, and to support and protect the Whistleblower, and

(iv) take reasonable steps to ensure its personnel understand the requirements of this policy.

(e) You should also be aware that during an investigation, it may be necessary for us to tell the people who are believed to be involved in the Wrongdoing about the alleged Wrongdoing. This is to ensure a fair investigation and provide those people with an opportunity to respond to the allegations. Although we will not tell these people your identity unless you give consent, it is possible that the details of the report may lead them to believe that they know the identity of the Whistleblower.

(f) Any breach of confidentiality will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of engagement with Rutherglen Kindergarten. Breaches of Whistleblower confidentiality are also an offence under the Corporations Act and the Taxation Administration Act and serious penalties apply for both individuals and corporations.

(g) If you believe your confidentiality as a Whistleblower has been breached, you can make a complaint to one of the Disclosure Officers listed in section 5.1. You can also lodge a complaint with ASIC, APRA or the ATO.

6.2 Protection against detrimental conduct

(a) Rutherglen Kindergarten is committed to protecting the rights of Whistleblowers who have made Protected Reports and will not tolerate any detriment or threats of detriment against them or any other person (e.g. suspected whistleblowers or people who participate in investigations).

(b) It is an offence under the Corporations Act and the Taxation Administration Act to cause, or threaten to cause, detriment to a person because they or someone else has made, may have made, proposes to make or could make a Protected Report and serious penalties apply for both individuals and corporations. A person who is subject to such detriment may also seek compensation or other remedies from a Court if they have suffered loss, damage or injury because of a Protected Report or because we failed to take reasonable precautions and exercise due diligence to prevent the detriment.

(c) "Detriment" includes dismissal, suspension, demotion, or termination of your employment or engagement with us; changes to your employment, position, or duties to your disadvantage; discrimination; harassment or intimidation; harm or injury (including psychological harm); damage to property, reputation, business or financial position; or any other damage.

(d) The following actions are not considered to be detriment:

(i) reasonable administrative action taken to protect a Whistleblower from detriment (e.g. relocating them to another office to prevent victimisation)

(ii) managing unsatisfactory work performance of a Whistleblower, in line with Rutherglen Kindergarten usual performance management framework.

(e) Rutherglen Kindergarten will protect Whistleblowers from detriment arising from making a Protected Report by:

(i) conducting a risk assessment of the disclosure to manage the risk of detriment to the Whistleblower

(ii) where applicable, making such reasonable adjustments as required to allow the Whistleblower to perform their duties at work without being potentially exposed to detriment (eg by changing reporting lines or location).

(f) If you believe you have suffered detriment, you can make a complaint to one of the Disclosure Officers listed in section 5.1. You can also lodge a complaint with ASIC, APRA or the ATO.

6.3 Protection for Whistleblowers against litigation

If you make a Protected Report, you are protected from any of the following legal actions for doing so:

(a) Civil liability (e.g. any legal action against you for breaching an employment contract, a duty of confidentiality or another contractual obligation)

(b) Criminal liability (e.g. legal action against you for unlawfully releasing information, or other use of the Protected Report against you in a criminal proceeding (other than for making a false disclosure)

(c) Administrative liability (e.g. disciplinary action for making the Protected Report).

You are still responsible for your own actions. These protections do not prevent action being taken against you for any Wrongdoing that you are involved in that is revealed in your report.

6.4 Other support available for Whistleblowers

(a) We will support you while your Protected Report is being handled by Rutherglen Kindergarten.

(b) If necessary, Rutherglen Kindergarten will appoint a Protection Officer to arrange or coordinate support and protection for Whistleblowers who have made or are in the process of making a Protected

Report. A Whistleblower can contact a Discloser Officer to discuss how a Protection Officer may be able to provide support and protection.

(c) The role of the Protection Officer is to:

(i) assess the immediate welfare and protection needs of a Whistleblower

(ii) safeguard the interests of a Whistleblower in accordance with this policy and the law, and

(iii) address any issues or concerns of detriment.

(d) Employees may also contact our Employee Assistance Program: [#insert contact details].

7. How we handle Protected Reports

Any person who receives a Whistleblower report made under this policy must ensure that the report is managed in compliance with this policy and any relevant procedures. This is to ensure that the protections available for the Whistleblower are not compromised and that Rutherglen Kindergarten meets its legal obligations.

7.1 How do we investigate reports of Wrongdoing?

(a) Reports of alleged Wrongdoing made in accordance with this policy will be treated seriously and where appropriate will be thoroughly investigated by Rutherglen Kindergarten in accordance with this policy [and management guidelines on handling and investigating Whistleblower reports].

(b) After receiving a report about Wrongdoing we will assess the information provided to determine whether it is a Protected Report, how it will be handled and whether an investigation is required. The precise steps to be taken to investigate a report will differ in individual cases but may include:

(i) appointment of an internal or external investigator (if it has been determined that an investigation is required)

(ii) the investigator or other person asking the Whistleblower whether they consent to their identity being disclosed to investigate the report

(iii) interviewing the Whistleblower and any other relevant person to obtain information about the report

(iv) review of relevant documents and other information in relation to the report

(v) the investigator making findings regarding the conduct reported.

(c) Generally, if the Whistleblower can be contacted, we will confirm receipt of their disclosure within 2 Business Days. The investigation of a Protected Report will commence as soon as reasonably possible from the date we receive it. However, there may be reasons why an investigation may take longer. If we think there might be a delay with the investigation, we will tell the person who made the Protected Report (where possible).

(d) Where possible and assuming that the identity of the Whistleblower is known, the Whistleblower will be kept informed of when the investigation process has begun, while the investigation is in progress and after the investigation has been finalised, subject to confidentiality and privacy considerations.

(e) Rutherglen Kindergarten may decide to take action in response to any findings which may include, but is not limited to, disciplinary action, reporting the matter to an appropriate regulator, conducting training or addressing procedural and policy deficiencies.

7.2 Treatment of employees who are the subject of a Whistleblower report

Rutherglen Kindergarten will take all reasonable steps to ensure that any employee who is the subject of a Protected Report is afforded fair treatment and an impartial investigation in accordance with this policy. Generally, when an investigation is conducted, employees who are the subject of a Protected Report may be, within the constraints of confidentiality:

(a) told about the substance of the allegations

(b) given a fair and reasonable opportunity to respond to the allegations before the investigation is finalised, and

(c) informed about the findings of the investigation and given an opportunity to respond to those conclusions before any action is taken against them (subject to legal, privacy and confidentiality requirements).

8. Reporting to the Board

The Board may be provided with details of the Whistleblower report and any findings made to ensure appropriate oversight of reports and investigation of matters reported under this policy.

If the Whistleblower does not provide consent for their identity to be disclosed, those persons within Rutherglen Kindergarten who are handling the report may disclose information to the Board that is reasonably necessary for the purposes of investigating the report, provided that all reasonable steps are taken to reduce the risk that the Whistleblower will be identified as a result of the report.

The Board will monitor the whistleblower management system to ensure that the broader trends, themes and/or emerging risks highlighted by the disclosures made under this policy are addressed and mitigated as part of Rutherglen Kindergarten's risk management and corporate governance.

9. Review, Access, Training and Further Information in relation to this policy

(a) This policy will be available to officers and employees of Rutherglen Kindergarten in the main office area.. A copy will also be available on our website to ensure it is accessible for all eligible whistleblowers.

(b) This policy may be reviewed and amended from time to time and will be reviewed by Rutherglen Kindergarten at least every two years.

(c) The kindergarten director will be responsible for conducting upfront and ongoing education and training on the whistleblower policy, processes and procedures to all officers and employees.

(d) If you require further information in relation to this policy, or how to make a Protected Report, you can contact Jo Lucas 02 6032 9456.