

Whistleblower Policy

Policy statement

Goodstart Early Learning Limited ('Goodstart') is committed to the highest standards of legal, ethical and moral behaviour.

Goodstart is committed to ensuring any Goodstart Employee is able to report serious instances of wrongdoing in a safe and protected manner.

Definitions

Whistleblowing means the disclosure of information from a Goodstart Employee or supplier who has reasonable grounds to suspect that the information concerns misconduct (which includes fraud, negligence, default, breach of trust and breach of duty), or an improper state of affairs or circumstances in relation to the company. This may include if that person has reasonable grounds to suspect that the company has engaged in criminal activity or breached legal or regulatory requirements.

What is not Whistleblowing? A report that concerns a Personal Work-Related Grievance is not a disclosable matter under this policy and must instead be dealt with through the company's Employee Grievance and Complaints Handling Procedure.

Eligible Recipient means Your Call, as Goodstart's nominated whistleblowing reporting service or any other Officer or Senior Manager of the company.

Goodstart Employee means any current or former employees or members of staff including temporary workers, interns, secondees, officers and directors, contractors and consultants, employed or engaged by Goodstart.

Personal Work-Related Grievance means when the disclosed information concerns a complaint or grievance about any matter in relation to your employment, or former employment with Goodstart, having implications for you personally.

Public Interest Disclosure means a disclosure to a member of the Commonwealth or a State or Territory Parliament or legislature or a journalist of a Whistleblowing disclosure previously disclosed.

Senior Manager means a member of the Goodstart Senior Leadership Team (SLT).

How to report wrongdoing

Reports of Wrongdoing can be made using Goodstart's external whistleblowing service managed independently by Your Call:

Whistleblowing reporting service provided by Your Call

Online: <http://www.yourcall.com.au/goodstart>

Hotline: 1300 790 228 (Monday to Friday, 7.00am to 12.00am AEST)

Translation services are available through the Translating and Interpreting Service on 131 450.

Reports can also be made to other Eligible Recipients. To qualify for legal protections, disclosures must be made directly to an Eligible Recipient. To confidentially discuss the operation of this policy, you can contact Your Call or a Whistleblower Protection Officer before making a report.

DOCUMENT NUMBER & TITLE		BM4 Whistleblower POLICY			
CONTENT OWNER	Goodstart Board	DOCUMENT AUTHOR	Company Secretary & General Counsel		
DATE PUBLISHED	01/09/2024	DOCUMENT VERSION	V13.0	REVISION DUE DATE	31/08/2025
Ensure you are using the latest version of this policy.					
Warning – uncontrolled when printed. This document is current at the time of printing and may be subject to change without notice.					

The Eligible Recipient will only disclose your identity to the Whistleblower Protection Officer with your consent. If you do not consent to the disclosure of your identity to the Whistleblower Protection Officer, the Eligible Recipient will correspond with the Whistleblower Protection Officer on your behalf throughout the investigation. Alternatively, you may also report the information to Goodstart's auditors, or ASIC or APRA.

You may choose to remain anonymous when making a disclosure. However, it should be noted that it may be more difficult for the alleged wrongdoing to be fully investigated if further information cannot be sought from the whistleblower.

Confidentiality of Whistleblowers identity and Whistleblowing reports

If a person makes a report of alleged or suspected wrongdoing, Goodstart will protect your identity from disclosure. Generally, Goodstart will not disclose your identity unless:

- you consent to the disclosure; and/or
- the disclosure is required or authorised by law.

It may also be necessary to disclose details of a report to any person against whom allegations are made. There may be circumstances if your identity could be readily identifiable as a result of disclosure, where a report cannot be fully investigated unless you provide consent to the disclosure of your identity.

Goodstart will store records relating to a whistleblower report securely and only permit access by authorised persons. Unauthorised disclosure of information relating to a report is prohibited and may result in disciplinary action, including dismissal.

Protection of Whistleblowers

Goodstart will not tolerate any adverse conduct against any person who has made or is believed to have made a whistleblower report.

Any such action will be treated as serious misconduct and will result in disciplinary action, which may include dismissal. If after making a report you believe retaliatory action or victimisation has occurred or been threatened, you have the right to make a further report about that conduct under this Policy.

You will not be subject to any liability for making a disclosure under this policy unless you make a report that you know is untrue or misleading. If you have been involved in the wrongdoing that you are reporting however, making a report will not necessarily shield you from the consequences of those actions.

How Whistleblower reports will be investigated

When a Whistleblower report is made:

- the Whistleblower Protection Officer will let the caller know their rights in relation to confidentiality and protection.
- Detailed notes of the issues raised will be taken.
- Goodstart's response to a report will vary depending on the circumstances. A report may be addressed and resolved informally or through formal investigation. All reports are reported to Goodstart's Board.
- The Whistleblower Protection Officer will assess the complaint and determine if it should be referred to the appropriate person for investigation, noting that it may not be appropriate to use the usual reporting lines.
- All parties involved in the investigation of a whistleblower complaint will be made aware of the fact that it is a whistleblower complaint and the requirement to maintain confidentiality and protect the whistleblower. Permission must be obtained from the Whistleblower before revealing their identity to anyone. A copy of this policy will for forwarded to the investigator.

DOCUMENT NUMBER & TITLE		BM4 Whistleblower POLICY			
CONTENT OWNER	Goodstart Board	DOCUMENT AUTHOR	Company Secretary & General Counsel		
DATE PUBLISHED	01/09/2024	DOCUMENT VERSION	V13.0	REVISION DUE DATE	31/08/2025
Ensure you are using the latest version of this policy.					
Warning – uncontrolled when printed. This document is current at the time of printing and may be subject to change without notice.					

- The BM6 Investigation Process Appendix will be followed with additional confidentiality and protection as required under the Whistleblower legislation.
- In some circumstances it may not be appropriate to provide details of the outcome of an investigation to a whistleblower. A whistleblower will not be provided with a copy of any investigation report.

False reporting

Where a person has knowingly made a false report of wrongdoing, then that conduct itself will be considered a serious matter and that person may be subject to disciplinary action which may include dismissal.

Management of a person against whom a Whistleblowing report is made

Individuals referred to in a whistleblowing report will be treated fairly and supported through the assessment and investigation process. This will involve the investigation being handled as confidentially as possible and ensuring that the individual has the opportunity to answer the allegations during the investigation.

Whistleblowing Protection Officers

The role of a Whistleblower Protection Officer is to safeguard the interests of the whistleblower. The Whistleblower Protection Officer has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the CEO or any senior management team member or Director of the company, as may be required.

The Whistleblower Protection Officer is responsible for appointing an investigator to inquire into the substance of reports. On the basis of sufficient evidence in support of matters raised in a report, the Whistleblower Protection Officer determines whether to refer reports for further action or refute these where necessary.

Public Interest Disclosure or emergency reporting

If you have made a Whistleblowing disclosure under this policy that qualifies for protection under applicable laws, and 90 days has passed since you made the disclosure and you have reasonable grounds to believe that action is not being or has not been taken to address the matter and you have reasonable grounds to believe that further disclosure would be in the public interest or that the information concerns a substantial and imminent danger to the health or safety of one or more persons or the natural environment, you may make a Public Interest Disclosure.

Prior to making a Public Interest Disclosure you must notify the company in writing providing details of the previous disclosure and stating that you intend on making a Public Interest Disclosure.

Whistleblower Reports in relation to tax issues

A disclosure that relates to tax avoidance behaviour can also be reported directly to the ATO (Australian Taxation Office). Information is available on the ATO website.

How is this policy made available?

This policy forms part of the induction information provided to all employees of the company and mandatory online awareness training undertaken by all employees annually. A copy of this policy is also on the company's Intranet Page which is accessible to all employees, as well as on the company website.

Related Documents

BM1 Code of Conduct POLICY ; BM6 Ensuring a Fair Workplace POLICY ; BM6 Employee Grievance and Complaints Handling PROCEDURE ; BM9 Modern Slavery REQUIREMENT

DOCUMENT NUMBER & TITLE		BM4 Whistleblower POLICY			
CONTENT OWNER	Goodstart Board	DOCUMENT AUTHOR	Company Secretary & General Counsel		
DATE PUBLISHED	01/09/2024	DOCUMENT VERSION	V13.0	REVISION DUE DATE	31/08/2025
Ensure you are using the latest version of this policy.					
Warning – uncontrolled when printed. This document is current at the time of printing and may be subject to change without notice.					

Responsibilities

This policy applies to: All Goodstart officers and employees, volunteers, suppliers, contractors (including employees of suppliers and contractors), Board members, parents/guardians of children and any other person who has dealings with the company and any relative, dependant or spouse of the aforementioned.

Whistleblowing contacts

Whistleblowing reporting service provided by Your Call

Online: <http://www.yourcall.com.au/goodstart>

Hotline: 1300 790 228 (Monday to Friday, 7.00am to 12.00am AEST)

If you have difficulty speaking or understanding English, Your Call can be contacted through the Translating and Interpreting Service on 131 450.

Whistleblower Protection Officers / Eligible Recipients for disclosures

Gavin Bartlett, General Counsel

Email: gbartlett@goodstart.org.au

Phone: 0447 538 320

Nadine Fiers, Company Secretary

Email: nfiers@goodstart.org.au

Phone: 0482 110 405

DOCUMENT NUMBER & TITLE		BM4 Whistleblower POLICY			
CONTENT OWNER	Goodstart Board	DOCUMENT AUTHOR	Company Secretary & General Counsel		
DATE PUBLISHED	01/09/2024	DOCUMENT VERSION	V13.0	REVISION DUE DATE	31/08/2025
Ensure you are using the latest version of this policy.					
Warning – uncontrolled when printed. This document is current at the time of printing and may be subject to change without notice.					