

WHISTLEBLOWER POLICY

COMMON PURPOSE (the "Organization")

All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting and other malpractices at the earliest opportunity, and in an appropriate way.

This Whistleblower Policy of the Organization:

1. encourages employees and volunteers to come forward with credible information on illegal practices or serious and substantial violations of adopted policies of the Organization
2. specifies that the Organization will protect the person from retaliation and
3. identifies where such information can be reported, providing a transparent and confidential process for dealing with concerns

This policy not only covers possible improprieties in matters of financial reporting, but also:

- fraud;
- corruption, bribery or blackmail;
- criminal offences;
- failure to comply with a legal or regulatory obligation;
- miscarriage of justice;
- endangering the health and safety of an individual; and
- concealment of any of the above.

Principles

- All concerns raised will be treated fairly and properly
- We will not tolerate the harassment or victimisation of anyone raising a genuine concern
- Any individual making a disclosure will retain their anonymity unless they agree otherwise
- We will ensure that any individual raising a concern is aware of who is handling the matter
- We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. We do not however extend this assurance to someone who maliciously raises a matter they know to be untrue.

1. Encouragement of Reporting

The Organization encourages complaints, reports or inquiries about illegal practices or serious and substantial violations of the Organization's policies, including illegal or improper conduct by the Organization itself, by its leadership or by others on its behalf.

2. Protection from Retaliation

The Organization prohibits retaliation by or on behalf of the Organization against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Organization reserves the right to discipline

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persons who make bad faith, knowingly false or vexatious complaints, reports or inquiries, or who otherwise abuse this policy.

3. Where to Report

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries.

They should be directed to the [Director, Learning & Innovation](#); if they are implicated in the complaint, report or inquiry, it should be directed to the [Group CEO](#). The Organization will conduct a prompt, discreet and objective review or investigation. Staff or volunteers must recognize that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact the [Chair of the Board of Trustees](#).

Employees, who have raised concerns internally, will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

Employees' identities will not be disclosed without prior consent. Where concerns are unable to be resolved without revealing the identity of the employee raising the concern, (e.g. if their evidence is required in court), we will enter into a dialogue with the employee concerned as to whether and how we can proceed.

Public Interest Disclosure Act

All UK employees will be protected under the Public Interest Disclosure Act 1998, where they make a protected disclosure. These are disclosures of information, which in the reasonable belief of the employee making the disclosure, cover the following employer activities:

- a criminal offence has been, is being, or is likely to be, committed;
- that a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- that health and safety of an individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; and
- that information relating to the above is being deliberately concealed.

Employees in other territories will be treated by the Organization as if such legislation applied to them.



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Review

Responsibility for reviewing and updating the Whistleblowing Policy lies with the Director, Learning and Innovation and nominated Trustee. This document will be reviewed and updated every 12 months.

Last reviewed: February 2025

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Next review scheduled: February 2026