



Whistleblower Policy

Effective Date: 2025.02.21

Last Reviewed: 2024.11.11

Version: v1.1 2026.08.05

1. Purpose

The purpose of this Whistleblower Policy is to:

- a. Create a structured framework for the safe and confidential reporting of unlawful conduct, breaches of Alphacrucis University College (AC) policies, and any form of serious misconduct that could adversely affect AC's operations or reputation.
- b. Encourage and foster a culture of transparency, integrity, and accountability across the college's activities and relationships with internal and external stakeholders.
- c. Provide protection and support for whistleblowers who raise legitimate concerns in good faith, ensuring they do not suffer any form of retaliation, discrimination, or disadvantage as a result of their disclosures.
- d. Ensure that all reported matters are investigated fairly, thoroughly, and independently, while respecting the rights and dignity of all individuals involved.
- e. Ensure compliance with relevant Australian laws, such as the Corporations Act 2001 and any other applicable regulatory requirements.

This Policy supports AC's mission to maintain a safe, ethical, and compliant workplace and to act with integrity in all facets of its operations.

2. Scope

The scope of this policy applies to all current and former employees, contractors, suppliers, volunteers, students, board members, and senior executives of Alphacrucis University College, as well as their relatives or dependents.

It covers disclosures made in good faith about disclosable matters, ensuring legal protections for whistleblowers in accordance with relevant laws.

2.1. What is within scope

2.1.1. Protected Disclosures are within scope. Protected Disclosures are disclosures of **Misconduct or Improper Conduct** which includes any conduct that breaches AC's policies, legal obligations, or ethical standards. Examples include, but are not limited to:

- a. Fraud, corruption, or financial mismanagement.
- b. Maladministration.
- c. Harassment, bullying, or discrimination.
- d. Misuse of confidential or personal information.
- e. Endangerment to the health, safety, or wellbeing of staff, students, or visitors.
- f. Breaches of academic integrity or misuse of academic resources.
- g. Actions that are detrimental to AC's reputation or operations.
- h. Any conduct that constitutes a serious risk to public health or safety, the environment, or the administration of justice.

2.2. What is out of scope

- a. **Personal Work-Related Grievances:** Issues such as interpersonal conflicts, dissatisfaction with a performance review, or disputes about employment terms, unless such matters involve broader misconduct, should be resolved using AC's Staff Grievance Resolution Policy.



- b. **Academic Disputes:** Student concerns about grades or academic decisions are generally handled through AC's established academic appeals processes and do not fall under this Whistleblower Policy unless they involve serious misconduct. Please refer to the Student Complaint, Grievance Resolution and Appeals Policy on such matters.

3. Policy Statement

- 3.1. Alphacrucis University College is committed to upholding the highest standards of integrity and ethical behaviour in all its operations. This Whistleblower Policy demonstrates AC's commitment to encouraging employees, students, and stakeholders to speak up if they become aware of wrongdoing, while ensuring they are fully supported and protected throughout the process.

- 3.2. Key Principles of this Policy:

3.3. Confidentiality and Anonymity

- 3.3.1. AC is committed to ensuring that all whistleblower disclosures are treated confidentially, and the identity of the whistleblower is protected. Disclosures can also be made anonymously, but doing so may limit the ability to fully investigate the matter. AC will only disclose the identity of the whistleblower if:
 - a. The whistleblower consents to the disclosure.
 - b. It is required by law, such as under an investigation by the Australian Securities and Investments Commission (ASIC) or other relevant authorities.
- 3.3.2. Whistleblowers will be informed of any requirement to disclose their identity before any disclosure is made.

3.4. Protection from Retaliation

- 3.4.1. Whistleblowers who make a disclosure in good faith will be protected from retaliation or adverse actions arising from their disclosure, including:
 - a. Dismissal, demotion, or denial of promotion.
 - b. Discrimination or harassment.
 - c. Adverse changes in working conditions, such as transfer to less desirable duties.
 - d. Threats, intimidation, or other forms of bullying.
 - e. Injury, damage or loss.
 - f. Damage to their property.
 - g. Damage to their reputation.
- 3.4.2. Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, including possible termination of employment. AC is also committed to ensuring that whistleblowers are not disadvantaged in any way as a result of making a disclosure.

3.5. Fair and Impartial Investigation

- 3.5.1. All disclosures made under this Policy will be promptly assessed and investigated in a fair, impartial, and confidential manner. Investigations will be conducted by appropriately qualified individuals, such as members of AC's Human Resources Department, external investigators, relevant committees or legal counsel, depending on the nature and complexity of the case.
- 3.5.2. Where required, independent third parties may be engaged to ensure that investigations are unbiased and thorough. Both the whistleblower and the person against whom the allegations are made will have the opportunity to present their side of the story, and all parties involved will be treated with respect and dignity throughout the process.

3.6. Support for Whistleblowers

- 3.6.1. Whistleblowers will have access to ongoing support throughout the process. This includes:
 - a. Confidential counselling services, such as AC's Employee Assistance Program (EAP).



- b. Information on legal protections available to whistleblowers under relevant Australian laws.
- c. Regular updates on the progress of the investigation, provided it does not compromise the investigation's confidentiality or integrity.

3.6.2. AC will also ensure that those accused of misconduct are treated fairly and that their rights are protected during the investigation.

3.7. No Tolerance for False Reports

3.7.1. While AC encourages employees, students, and stakeholders to raise concerns, it is important that disclosures are made in good faith. Deliberate false reporting or vexatious allegations will not be tolerated and may result in disciplinary action. If an individual knowingly makes a false disclosure, AC reserves the right to take appropriate action, including termination of employment or other contractual arrangements.

3.8. Training and Awareness

3.8.1. All AC employees will receive training on the Whistleblower Policy as part of their induction, and periodic refresher training will be provided to ensure ongoing awareness.

4. Procedures

4.1. How to Make a Disclosure

4.1.1. Disclosures of misconduct can be made through several channels, depending on the nature and seriousness of the issue. Whistleblowers may report directly to any of the following:

- a. **Direct Manager or Supervisor:** If appropriate, employees are encouraged to report concerns to their direct manager or supervisor. Managers must report the concern to the HR Manager to ensure proper handling.
- b. **HR Department:** The HR Manager is available to receive reports where employees or stakeholders do not feel comfortable speaking with their manager. HR will escalate serious matters to the appropriate parties.
- c. **HR Manager:** The HR Manager is responsible for overseeing the investigation of disclosures and ensuring compliance with this Policy. The HR Manager may be contacted directly for any whistleblowing disclosure.
- d. **Anonymous Reporting:** Disclosures may also be made anonymously via a call or email to the HR Manager. While anonymity is respected, whistleblowers are encouraged to provide sufficient information to allow for a meaningful investigation.

4.1.2. If a disclosure is made from an email address from which the discloser's identity cannot be determined, and the discloser does not identify themselves in the email, AC will treat it as an anonymous disclosure.

4.1.3. If the disclosure is regarding HR or a member of HR, disclosure may be made to the Vice President Operations. If the disclosure is regarding a member of the Executive Team, the disclosure can be made to the President.

4.2. What to Include

4.2.1. Reports can be made orally or in writing.

4.2.2. Reports should include:

- a. A short description of the conduct that constitutes the alleged wrongdoing;
- b. Where and when key events took place;
- c. Names, roles and titles of people involved; and
- d. How each person is involved.

4.3. Investigation Process

Once a disclosure has been received, the following steps will be taken:



4.3.1. Initial Assessment:

- a. The HR Manager or another designated officer will conduct an initial assessment to determine whether the matter falls within the scope of this Policy and requires further investigation.
- b. The HR Manager will also make a preliminary determination to assess whether the disclosure is made in good faith or vexatious or is a false disclosure.
- c. If the disclosure is outside the scope of this Policy (e.g., a personal grievance or academic grievance), the whistleblower will be advised to pursue other internal channels for resolution via the Staff Grievance Resolution Policy or Student Complaint, Grievance Resolution and Appeals Policy on such matters.

4.3.2. Investigation Planning:

- a. A decision will be made about how to proceed, including whether to appoint internal or external investigators and whether other parties need to be notified (e.g., legal advisors, relevant committee or law enforcement).
- b. The scope of the investigation will be defined, and an investigation timeline will be established.

4.3.3. Conducting the Investigation:

- a. The investigation will be conducted confidentially and impartially. Evidence will be gathered, interviews may be conducted, and records will be kept.
- b. The whistleblower will be informed of the progress of the investigation at reasonable intervals, while maintaining the confidentiality and integrity of the process.

4.3.4. Outcome and Recommendations:

- a. Upon completion of the investigation, a report will be prepared outlining the findings and any recommendations for further action. This may include disciplinary measures, process improvements, or legal action.
- b. The whistleblower will be notified of the outcome to the extent that it is appropriate and lawful to do so.

5. Roles and Responsibilities

- 5.1. **HR Manager:** The HR Manager is responsible for receiving and assessing disclosures, ensuring proper investigation, the protection of the whistleblower from retaliation and reporting to senior management.
- 5.2. **HR Department:** Acts as a point of contact for disclosures and ensures that investigations are handled in compliance with this Policy.
- 5.3. **Executive Management:** Ensures that appropriate resources and support are available to investigate disclosures and protect whistleblowers.
- 5.4. **All Employees, Contractors, and Stakeholders:** Responsible for reporting any known or suspected wrongdoing in accordance with this Policy.

6. Responsible for Implementation

- 6.1. Chief Financial Officer

7. Related AC Policies or Documents, Standards and Legislation

7.1. AC Policies or Documents

This policy is to be read in conjunction with the following AC policies available at ac.edu.au/ppm/:

- 7.1.1. Code of Conduct Policy;
- 7.1.2. Student Complaint, Grievance Resolution and Appeals Policy;
- 7.1.3. Staff Grievance Resolution Policy.



7.2. Relevant Standards and Legislation

7.2.1. [Corporations Act 2001 \(Cth\)](#).

8. Review and Revision

This policy will be reviewed by the Chief Financial Officer on a regular basis in accordance with the Policy Development and Review Policy. Any proposed changes will be tabled at the Executive for endorsement and Council for approval. Revisions will be communicated to all relevant stakeholders upon approval.

9. History of Approval and Amendments

Policy owner	Chief Financial Officer
Policy category	Finance & Risk: Council
Policy status	TBA
Approval Body	Council
Endorsement Body	Executive
Approval Date	2025.02.21
Last Review Date	2024.11.11
History of Policy Amendments	
V1 2025.02.21	New Policy – as requested.
V1.1 2026.08.05	New template, replace VPO into CFO

Add a new row for each version of the policy. Do not remove previous rows/changes.

Appendices

N/A