



BUNBURY REGIONAL COMMUNITY COLLEGE

BRCC Whistleblower Policy



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Purpose

This policy is designed to encourage those who see wrongdoing to speak up. It describes how an “eligible” whistleblower can make a disclosure to an “eligible recipient” about a “disclosable matter” and describes the protections to which the whistleblower is entitled.

The BRCC Board recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include a system whereby employees and others can report their concerns freely and without fear of repercussion.

This Policy does not in any way limit the responsibilities or protections afforded to individuals making a protected disclosure under the *Corporations Act 2001*.

Scope

This policy is applicable to Bunbury Regional Community College community.

Definitions

CARE School

A Curriculum and Re-engagement in Education school, established and registered solely for the education of students at educational risk.

College community is the students, school staff (teachers, administrators, other staff, and volunteers), parents and carers, board members, and others with an interest in the school.

Detriment has a very broad meaning and includes dismissal of an employee, injuring an employee in their employment, alteration of an employee's position or duties to their disadvantage; discrimination between an employee and other employees; victimisation of a dependent of the discloser, harassment or intimidation of a person or harm or injury to a person, including psychological harassment; damage to a person's property, reputation or business or financial position.

Disclosable matters A disclosable matter is a disclosure of information where the discloser has “reasonable grounds to suspect” that information relating to the school, or a related company is:

- misconduct;
- an improper state of affairs or circumstances;
- an illegal activity (including conduct of officers and employees) – meaning activity in breach of the Corporations Act or specified financial services legislation, or an offence against any law of the Commonwealth punishable by imprisonment of 12 months or more; or
- conduct (including conduct of officers and employees) that represents a danger to the public or financial system

Eligible Recipient is:

- an officer or senior manager of the school or a related company, such as a member of the governing body of the school, the Principal, the College Director, the Chief Operating Officer;
- an auditor, or member of an audit team, of the school or a related company;
- an actuary of the school or a related company; and



- a person authorised by the school to receive disclosures.

Disclosures may also qualify for protection if they are made to ASIC, Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth authority, or if an eligible whistleblower makes a disclosure to a legal practitioner to obtain advice.

Eligible Whistleblowers in a school context are:

- a member of the governing body of the school;
- an employee of the school;
- a person who supplies goods or services (paid or unpaid) to the school,
- an employee of a person who supplies goods or services (paid or unpaid) to the school;
- an individual who is an associate of the School (as defined in the Corporations Act);
- a relative or dependent (or dependents of a spouse) of any individual described above;
- parents who volunteer or have volunteered for such things as camps, or sport activities; and
- the relatives and dependents of the volunteer and of the volunteer's spouse.

There is no requirement that the disclosure be related to information obtained while the person was providing the particular service they were at the college to deliver.

Parent/carer includes parents, non-parental carers, foster parents, grandparents, and other carers of students.

Personal work-related grievances are those that relate to your current or former employment and only have implications for you personally, with no other significant implications for BRCC or other matters of misconduct beyond your personal circumstances.

Potential Misconduct refers to any suspected or actual misconduct; or improper state of affairs or circumstances in relation to BRCC or its people. This may include behaviour that you believe contravenes BRCC's Code of Conduct, other company policies or the law. Potential Misconduct does not generally include Personal Work Related Grievances.

Reasonable grounds mean that the discloser has the suspicion that could reasonably be formed based on the facts and information available to them. The recipient is not required to believe the suspicion.

Unfounded disclosure is when there are no reasonable grounds to suspect a disclosable matter has occurred. If the disclosure is unfounded, the discloser is not protected by this policy or the Corporations Act. BRCC may seek legal advice before deciding a disclosure is unfounded or taking any action in relation to the disclosure.

Whistleblower is 'an insider within an organisation who reports misconduct or dishonest or illegal activity that has occurred within that same organisation'.



Policy

Context

Bunbury Regional Community College (BRCC) is a 'Curriculum and Re-engagement in Education' (CARE) School that caters specifically to students who have disengaged from mainstream education. The College offers a full-time alternative education program under the *School Education Act 1999 (WA)*.

Schools that are bodies corporate (companies limited by guarantee, incorporated associations (if they are trading or financial corporations) or body corporates (under any law) are required to observe the provisions of the *Corporations Act 2001* which relate to whistleblowing. Further information about this, for not-for-profit organisations, is available from the ASIC website at: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-protections-for-not-for-profit-organisations/>

Independent schools are required to apply the whistleblower protections in the event of the receipt of a qualifying disclosure from an eligible whistleblower.

Under the new provisions in the Corporations Act a person who is an “**eligible**” whistleblower who makes a disclosure to an “**eligible recipient**” about a “**disclosable matter**” is entitled to certain protections, including a right to have their identity kept confidential and protection from detriment.

Who the Policy applies to

This Policy applies to any individual who is:

- (a) a current or former BRCC employee, including employees who are permanent, part-time, fixed term or temporary, teachers, education assistants, volunteers, office staff, and managers;
- (b) a current or former officer or associate of BRCC, for example a director or company secretary;
- (c) a service provider or contractor who is providing, or has provided goods or services to BRCC, whether paid or unpaid (e.g. volunteering) including their employees; and
- (d) a relative, dependent, or spouse of an individual identified in (a) to (c) above.

Anyone with information about potential misconduct is encouraged to speak up and report it.

What matters can be reported under the Policy

BRCC encourages any person identified in (a) to (d) above to speak up about potential misconduct. When doing so the person should provide as much information as possible, including details of the potential misconduct, people involved, dates, locations and if any more evidence may exist.

When speaking up, it is expected the person will have reasonable grounds to suspect the information you are disclosing is true and accurate from first-hand knowledge, but you will not be penalised if the information turns out to be incorrect.

However, you must not make a report that you know is untrue or misleading. **Deliberate**



false reporting will not be covered by this policy and will not be a protected disclosure.

Where it is found that the person reporting potential misconduct has knowingly made a false report, this may result in disciplinary action.

Potential Misconduct

Potential Misconduct under this Policy includes, but is not limited to:

- failure to comply with, or breach of legal or regulatory requirements;
- breach of BRCC's Code of Conduct or other BRCC policies;
- conduct endangering the health and safety of any person or persons;
- ill-treatment of a student or staff member;
- unauthorised use of BRCC's confidential information;
- concerns that pose a danger to the public or financial system (even if it does not involve a breach of law); and deliberate concealment of any of the above;
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure, or is believed or suspected to have made, or be planning to make a disclosure of a potential misconduct;
- engaging in or threatening to engage in detrimental conduct against a person who has made a mandatory report of child abuse, or is believed or suspected to have made, or be planning to make a disclosure of a child abuse;
- criminal activity;
- dealing in illicit drugs;
- bribery or corruption and payment or receipt of a bribe/inducement;
- conduct endangering health and safety or causing damage to the work environment;
- dishonest, unethical, or irresponsible behaviour;
- conflicts of interest, including those relating to outside business interests, relationships, improper payments, and donations;
- victimisation or harassment;
- misleading or deceptive conduct, including conduct or representations which amount to improper or misleading accounting, taxation, or financial reporting practices;
- conduct or practices which are illegal or breach any law;
- breaching employment law and the punishment can be imprisonment for 12 months or more;
- dishonest, unethical, or corrupt behaviour;
- theft, fraud, or misappropriation; or
- abuse of authority;

This Policy should be read in conjunction with BRCC's Code of Conduct, BRCC Child Safe Code of Conduct, BRCC Child Protection and Child Safe Policy; and BRCC Complaints Policy.

BRCC is committed to safeguarding the interests of the Whistleblower in accordance with this Policy and any applicable legislation.

BRCC undertakes to keep the Whistleblower informed of the progress of the report where practicable. The protections available to people who speak up and the way in which their report will be handled are described below.



Seeking Further Information

A whistleblower is allowed under the amendment to seek more information before they make a report. If a discloser requires further information BRCC will appoint a whistleblower protection officer (WIO) who has the authority to gather information without breaching the discloser's confidentiality.

Protections Available

The protections available to a whistleblower are those of confidentiality and no detriment.

BRCC will provide protection to a Discloser in relation to protecting their confidentiality by:

- all personal information or reference to the discloser witnessing an event will be redacted;
- the discloser will be referred to in a gender-neutral context;
- where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;
- disclosures will be handled and investigated by qualified staff;
- all paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- communications and documents relating to the investigation of a disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

BRCC will provide protection to a Discloser in relation to ensuring there is no detriment by:

- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), will commence as soon as possible after receiving a disclosure;
- support services (including counselling or other professional or legal services) will be available to disclosers;
- strategies will be provided to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- if required BRCC will allow the discloser to perform their duties from another location, may reassign the discloser to another role at the same level, or may make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;
- the College will ensure that management/the eligible recipient are aware of their responsibilities to maintain the confidentiality of a discloser, address the risks of isolation or harassment, manage conflicts, and ensure fairness when managing the performance of, or taking other management action relating to, a discloser is in place;
- having procedures on how a discloser can lodge a complaint if they have suffered detriment, the complaint will be investigated as a separate matter.



Further Protection to Whistleblowers

In addition to the above, under Australian law, a discloser who has reasonable grounds for suspecting that wrongdoing has taken place, and who reports the matter to an eligible recipient, may be entitled to additional legal protections in certain circumstances, including:

- They may be protected from civil, criminal, or administrative legal action for making the report;
- They may be protected from contractual or other remedies being sought against them on the basis of the report;
- The information they provide may not be admissible in evidence against them in legal proceedings (unless they have provided false information); and
- In some circumstances they may be entitled to compensation or another remedy through the courts if:
 - they suffer loss, damage, or injury because of a report of wrongdoing, and
 - BRCC failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Under Australian law, these protections may not apply to reports made to eligible recipients that concern a personal work-related grievance of the person making the report or breaches of the Code of Conduct that do not fall into the definition of disclosable matters.

Information You Should Provide When Reporting

You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and if any more evidence may exist. Information that may be helpful is set out below; however, you can still provide a report even if you do not have all of this information:

- your name and contact details (unless you choose to remain anonymous);
- the date and time of the Potential Misconduct;
- the date and time the Potential Misconduct was detected/observed;
- how the Potential Misconduct came to your attention;
- the nature of the Potential Misconduct;
- those involved in the Potential Misconduct;
- the names of all parties privy to/aware of the Potential Misconduct;
- the value of the loss (if any) to BRCC as a result of the Potential Misconduct; and
- details of any evidence to support/ substantiate the Potential Misconduct.

You can make an anonymous report if you do not want to reveal your identity. However, we encourage you to provide your name because it will make it easier to investigate and address your report.

If you do not provide your name, any investigation will be conducted as far as is practicable given the circumstances. It is also possible that an investigation may not be feasible where insufficient information is provided. Moreover, it may be difficult to offer you the same level of practical support if we do not know your identity.

If you do provide your name, it will only be disclosed where you provide your consent, or in exceptional circumstances, where the disclosure is allowed or required by law (e.g. in dealings with a regulator). If you have concerns about this, you can discuss this with a Recipient.



BRCC's Response To Reports of Misconduct

All reports of Potential Misconduct are taken seriously and will be dealt with in a confidential, prompt, and discreet manner.

BRCC's response to a report will vary depending on the nature of the report (including the amount of information provided).

Your report may be addressed and resolved informally or through formal investigation.

Where it is appropriate and practicable to investigate a report, the College Director or Board will appoint an appropriate investigator (or investigators) to assess and investigate the report. A person will only be asked to investigate a matter if they can do so in an impartial manner. In certain circumstances, BRCC may decide to appoint external investigators.

Where a report of suspected wrongdoing relates to a significant matter involving a member of the BRCC Executive or Board, the matter will be referred directly to an External Investigator when the whistleblower has provided consent (refer to Appendix A).

Whistleblowing does not guarantee that the report will be formally investigated, but all reports will be properly assessed and considered by BRCC as to whether they should be investigated. Reports may not be able to be investigated if BRCC is not able to contact the person who has made the report and insufficient information has been provided to warrant an investigation.

Whenever a report of suspected wrongdoing mentions or relates to any BRCC employees, BRCC is committed to treating those employees fairly, as appropriate in the circumstances.

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of:

- when the investigation process has begun;
- relevant progress of the investigation; and
- the outcome of the investigation to the extent that it is legally permissible and appropriate to do so.

If an investigation is conducted, the investigations process will adhere to the principles of independence, objectivity, confidentiality, and natural justice.

Any investigation will be independent from any persons to whom the disclosure relates.

Where it is appropriate and practicable to investigate a report, an appropriate investigator (or investigators) will be appointed by the BRCC Board to assess and when appropriate, a person being investigated will be provided with details of the disclosure that involves them and be given an opportunity to respond.

Where an investigation substantiates a breach of BRCC's Code of Conduct or internal policies or procedures, appropriate disciplinary action will be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

Concluding the Investigation

At the end of the investigation, the investigator(s) will prepare an investigation report that includes all relevant findings of the investigation.

The investigation findings will be reviewed independently of the investigator(s), to determine



an appropriate response, which may include rectifying any wrongdoing and taking any action required to prevent any future occurrences of the same or similar conduct.

The identity of the person who reported the wrongdoing will be redacted from any written investigation reports, unless they have consented to the disclosure of their identity.

Where allegations of wrongdoing made against a person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

A person who has committed or been involved in wrongdoing will not be immune from disciplinary action merely because they have reported the wrongdoing in accordance with this Policy. However, the person's conduct in making the report is likely to be taken into account in determining what disciplinary action is appropriate.

Once the matter is finalised, a report will be made to the whistleblower. This report will explain the findings and actions taken to the fullest extent possible within commercial, legal and confidentiality constraints.

Where the whistleblower chose to remain anonymous, alternative arrangements may be made for providing a verbal report of the outcome of the investigation to that person, where possible.

An eligible discloser may request a review of the investigation findings if the outcome is not to their satisfaction. The review will be conducted by an officer who is not involved in handling and investigating disclosures and the review findings will be appropriately shared with BRCC Risk Committee.

BRCC is not obliged to reopen an investigation if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

Confidentiality And Protecting Your Identity

Information coming into the possession of a person from a Whistleblower, the identity of the Whistleblower, or information which may lead to their identity will not be disclosed to anyone, unless you give your consent to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.

No details of reports made under this Policy will be included in an employee's personnel file or performance review.

Protection From Detrimental Conduct

No person may cause detriment to someone else (or threaten to do so) because of a belief that person has or will make a report under this Policy. Examples of detriment include discrimination, harassment, causing physical or psychological harm, damaging property, and varying an employee's role or duties.

Employees must not be discriminated against or disadvantaged in their employment with BRCC as a result of making a report in accordance with this policy. You should tell a Recipient if you or someone else is being, or has been, subject to detrimental conduct.



Any person involved in detrimental conduct will be subject to disciplinary action, including but not limited to termination of employment or engagement. In some circumstances, this may also be a criminal offence punishable by imprisonment. BRCC will take all reasonable steps to ensure that adequate and appropriate protection is provided for those who make a report. This protection applies if the matter is proven or not.

The protections offered will depend on things such as the Potential Misconduct and people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different business worksite;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- a person making a report who is a current or former employee may access BRCC's Employee Assistance Program and the support services provided therein; and/or
- rectifying any detriment that you have suffered.

In addition, BRCC may appoint a Whistleblower Protection Officer (WPO) to support and help protect you. If appointed, the Whistleblower Protection Officer will be your point of contact. They can arrange additional support for you where needed and can escalate any concerns you have with how your report is being dealt with. BRCC can only appoint a Whistleblower Protection Officer where you have agreed to share your identity with the Whistleblower Protection Officer.

BRCC will look for ways to support all people who speak up and make a report under this Policy, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. In all cases, BRCC will seek to offer as much support as practicable.

Reporting Disclosable Matters

BRCC encourages all staff or interested parties to speak to the Campus Manager, Principal, College Director, or the Chief Operating Officer in the first instance.

All reasonable attempts to resolve an issue informally and internally should first be tried, where appropriate. If, however, an individual does not feel safe or able to raise wrongdoing with the Campus Manager, Principal, College Director, or the Chief Operating Officer, they may make a disclosure using this Policy, where the issue concerns a disclosable matter:

- a) internally to our organisation
- b) The Chairperson
- c) to an independent whistleblower reporting company if BRCC elects to use one in the future, or
- d) to external authorities and entities.

A report can be made by telephone, email, or in person.

BRCC encourage disclosers to provide their names and a contact email, however a disclosure can be made anonymously. This may make it difficult to investigate the reported matter. If a discloser wishes to disclose anonymously, the discloser is encouraged to provide enough information to allow the matter to be properly investigated. The discloser is encouraged to provide an anonymous email to allow questions to be asked and information to be provided that could be helpful.



Internal disclosures

If a discloser would like to make a report internally under Australian whistleblower laws (and receive protection under those laws), they can make a confidential report of wrongdoing to any eligible recipient.

Disclosures to external authorities and entities

Reports may also be made under the Australian whistleblower laws to the following external eligible recipients:

- A lawyer, but not a lawyer employed by BRCC, for the purposes of obtaining legal advice or representation;
- The Australian Securities and Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Commissioner of Taxation, or another Commonwealth body prescribed by regulation, as appropriate;
- Under certain circumstances, to a journalist or member of Commonwealth, state, or territory parliaments in accordance with the requirements set out in the Act for making an “emergency disclosure” or a “public interest disclosure;” or
- If the report relates to BRCC’s tax affairs, a registered tax agent or BAS agent of BRCC.

Making Knowingly False Or Misleading Reports

When making a report of Potential Misconduct, you will be expected to have reasonable grounds to believe the information you are disclosing is true. You will not be penalised where the information turns out to be incorrect and the report was made on reasonable grounds.

However, where employees are found to have knowingly made a report that is deliberately untrue or misleading, the making of the report may be regarded as misconduct and may be subject to disciplinary action, which may include dismissal.

Work Related Grievances

Generally, any grievance that is related to the discloser’s employment, or former employment or having implications for the discloser personally does not qualify for protection.

The discloser is protected if the disclosure relates to contravention of the amendments around detriment or victimisation of the discloser, or the whistleblower is seeking legal advice in relation to the provisions of the amendment.

A disclosure is not a work-related grievance if:

- it has significant implications for the regulated school to which it relates, or another regulated entity, that do not relate to the discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct that represents a danger to the public or the financial system; or
- concerns conduct prescribed by regulation.



Confidentiality

The eligible recipient must not disclose the identity of the eligible whistleblower or information which is likely to lead to the identification of the eligible whistleblower. There are several exceptions, such as disclosures to

- ASIC or APRA;
- The Federal Police;
- A legal practitioner (for particular reasons);
- Certain State or Commonwealth authorities (for particular reasons);
- With consent of the whistleblower;
- When reasonably necessary to investigate the matter (steps must be taken to reduce the risk of identifying the whistleblower).

BRCC will seek legal advice if they are considering taking action that may identify a whistleblower.

Further Information

Any questions about this Policy or Whistleblowing can be referred to the Principal, College Director, Chief Operating Officer, or HR Adviser.

This Policy will be available on BRCC's website and on Employment Hero.

This Policy does not form part of terms of employment and may be amended from time to time.

Training in this Policy

Eligible recipients, potential investigators and all relevant BRCC staff will receive regular training in relation to their rights and obligations under this policy and under applicable whistleblower laws.

Applicable Legislation

School Education Act 1999

School Education Regulations 2000

Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018

Corporations Act 2001

Taxation Administration Act 1953

Banking Act 1959

Insurance Act 1973

Life Insurance Act 1995

Superannuation Industry (Supervision) Act 1993

Policy Review Date

This policy is due for review annually.

Contact BRCC

Web <http://www.brcc.org.au/contact/>

Email admin@brcc.org.au

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Approval Process	New Policy or Amendment	Minor Amendment or Review
<i>First Approved</i>	June 2022	n/a
<i>Reviewed</i>	June 2022	
<i>Endorsed by Principal</i>	June 2022	n/a
<i>Approved by Director</i>	June 2022	
<i>Governing Council Reading</i>	June 2022	n/a
<i>Next Review</i>	March 2023	



Appendix A – Consent Template

Acknowledgement and consent to disclosure for investigation and reporting purposes

CONFIDENTIAL

1. I, _____ (name of person making a disclosure), have made a disclosure of information to the following person:

Name of person	
Position title or role	

2. I have reasonable grounds to suspect that the information concerns a disclosable matter/s.

3. I have received a copy of the BRCC Whistleblower Policy.

4. I understand that information about my report that is unlikely to reveal my identity can be disclosed without my consent.

5. I understand that if my report is captured under whistleblower protections set out in the Corporations Act 2001 (Part 9.4AAA-Protection for whistleblowers), my identity and information that is likely to lead to my identity cannot be disclosed, unless authorised by law in the following circumstances:

- (i) my consent has been given
- (ii) the information is disclosed to a legal practitioner for the purpose of obtaining advice and representation in relation to whistleblower laws
- (iii) the information is reasonably necessary for the purpose of investigation of the matter and all reasonable steps to reduce the risk that I will be identified have been taken, or
- (iv) the information is disclosed to Australian Securities Investment Commission (ASIC), the Tax Commissioner (if a tax matter) or the Australian Federal Police (AFP).

6. I hereby give my consent to the disclosure of my identity, under conditions of confidentiality, and for the purpose of investigation and reporting as set out in the Whistleblower Policy to the following persons or organisations:

Name of person or organisation	Position title or role
Richard Cardwell	Chairperson
Posy Barnes	College Director
Travis Sprigg	Chief Operating Officer
Brett Piggott	Principal
	WIO (if appointed)
	WPO (if appointed)
	External Whistleblowing hotline (if appointed)
	Board Member

Signed by: _____

Name of discloser: _____

Signature of discloser: _____

Date: _____

