

Protected Disclosures (Corporate Wrongdoing) Policy | BM4

Our commitment

At Goodstart, we're committed to maintaining the highest standards of ethical behaviour across all areas of our organisation. We know that the people who work with us, provide services, or interact with us are often the first to notice when something might be wrong.

If you see something that doesn't feel right, we encourage you to speak up. We understand that speaking up can be difficult, but we're committed to supporting and protecting you throughout the entire process.

Who this Policy applies to

This Policy applies to everyone involved with Goodstart or BFS Children's Services ('collectively referred to as the Goodstart Group') who may notice something isn't right. This includes current and former staff, directors, contractors, consultants, service providers, their employees, and family members (like spouses or dependents).

When should you speak up

We know it's not always easy to speak up, but we encourage you to report it if you see or have reasonable grounds to suspect wrongdoing that could harm the Goodstart Group, its people, the children in its care or its reputation.

This could include:

- dishonest or fraudulent conduct (like improper use of position or authority, theft or misappropriation of funds or assets, or falsifying records);
- illegal conduct, (like bribery or corruption, or breaches of corporate laws, charity and not-for profit laws, workplace health and safety laws, and other certain laws);
- unethical conduct that indicates significant systemic or cultural issues (including wilful breach of workplace policies or procedures);
- gross mismanagement or conduct that could, or is likely to cause significant financial loss or implications to Goodstart (including reputation damage);
- engaging in, or threatening to engage in, detrimental conduct against a person who has or is suspected to have made a protected disclosure under this Policy or the Protected Disclosures (National Law) Requirement;
- human rights concerns within Goodstart's supply chain (including human trafficking, forced labour, or child labour); or
- conduct that poses a significant risk of harm to the public at large.
- any other behaviour or state of affairs that could lead to significant loss or harm.

How to speak up

If something feels off, there are a few ways you can report it. You can contact our independent disclosure hotline, **Your Call**:

Web http://www.yourcall.com.au/goodstart

Phone 1300 790 228 (Monday to Friday, 7.00am to 12.00am AEST)
Hearing or speech impairments services: Available through www.relayservice.gov.au and request Your Call's hotline, 1300 790 228
Translation services: Available through the Translating and Interpreting Service at 131 450

You can also report your concerns to one of the Eligible Recipients defined on page 4. If you would like more information about this Policy before making a disclosure, we encourage you to contact a Whistleblower Protection Officer listed on page 3.

Child safety, health or wellbeing concerns

If you have reason to believe that the safety, health, or wellbeing of a child is at risk, or suspect an offence against the Education and Care Services National Law ('National Law') has been, or is being committed, your disclosure may not be dealt with under this Policy.

For these matters, Goodstart employees must:

- report it as soon as practicable in line with Goodstart's Incident Management Procedure. This includes recording the incident in ServiceNow using the online incident reporting forms.

For these matters, BFS Children's Services employees must:

- report it as soon as practicable in line with BFS Children's Services Incident Management Procedure.

In addition, Goodstart and BFS Children's Services employees together with non-employees may:

- make a protected disclosure (where permitted under the National Law) to a centre director or another eligible Goodstart or BFS Children's Services manager.
- escalate concerns or make an anonymous disclosure via the Goodstart Group's independent third-party reporting service, Your Call (listed on page 1), if the concern has not been adequately addressed or you do not feel comfortable revealing your identity as part of making the disclosure.
- report externally (if needed) directly to the relevant early childhood education and care Regulatory Authority in your state or territory if you do not feel comfortable reporting within the Goodstart Group. These reports will also be treated as protected disclosures.

For further information, please refer to Goodstart's Protected Disclosures (National Law) Requirement or BFS Children's Services Protected Disclosure (National Law) Policy.

Personal work-related grievance concerns

If the issue you're facing is more personal, like a work performance issue or an interpersonal conflict, it generally isn't covered under this Policy. For these types of concerns, please refer to Goodstart's Employee Grievance and Complaints Handling Procedure.

How we protect you[1]

We are committed to protecting you throughout the entire process when you speak up by:

Protecting your identity and maintaining confidentiality	We won't share your identity or any information that could reveal your identity unless you give us consent or it's required by law. We will always ask for your consent before disclosing any details to another party. You can choose to stay anonymous or reveal your identity when speaking up. If you prefer to stay anonymous, we encourage you to submit your report through our independent disclosure hotline, Your Call. If you provide your name and contact details, they won't be visible to anyone at Goodstart.
Protecting you from Detriment	We're committed to protecting you from being treated unfairly or discriminated against for speaking up. You will not suffer any disadvantage, like job loss or retaliation, as a result of raising your concerns. We will assess your report and take all reasonable steps to investigate and resolve the issues raised, ensuring fairness to everyone involved.
Protecting you from liability	You will be protected from civil, criminal, and/or administrative liability (including disciplinary action) for speaking up, unless the disclosure is knowingly false or misleading.[2]

[1] To qualify for these protections, you must make your disclosure to either Your Call or an Eligible Recipient, in addition to being a discloser, and reporting a matter that falls within the scope of this Policy.

[2] If you're involved in the wrongdoing that you are reporting, making a report may not shield you from liability for your actions.

Providing you with support	We're here to support you throughout the process. Our Whistleblower Protection Officer will work with you to ensure all aspects of this Policy are followed. We also offer staff confidential and independent counseling through our Employee Assistance Program, managed by Telus Health. Employees can call 1300 361 008, with services available 24 hours a day, 7 days a week.

The investigation process

Once you report an issue, the Eligible Recipient may inform you of your rights around confidentiality and protection and gather as much information as possible. The matter will then be referred to a Whistleblower Protection Officer, who will assess your report, determine whether it fits within this Policy, and decide what action should be taken. If the matter involves a Whistleblower Protection Officer or a member of the Senior Leadership Team, it may be referred to the Goodstart Board Chair and/or Risk, Audit, Finance and Technology Committee Chair.

Your identity will only be shared if you give consent, or it is required by law. If you choose to stay anonymous, the Eligible Recipient will communicate with the Whistleblower Protection Officer or Goodstart Board member (as applicable) on your behalf throughout the investigation.

The Goodstart Group's response to a disclosure will depend on the situation. If an investigation is carried out, it will be done within a reasonable timeframe. All parties involved will be required to follow a fair and objective process, ensuring confidentiality and protections. If the investigator knows your identity, they won't share it without your permission and will take reasonable steps to minimise the risk of your identity being revealed. Where appropriate, you may be provided with update on the progress and outcome of the investigation. Any investigation reports will however remain the property of Goodstart and will not be shared.

Reports relating to whistleblower disclosures will be provided to the Goodstart Board Risk, Audit, Finance, and Technology Committee. While the method of documenting and reporting findings may vary depending on the nature of the disclosure, any reporting will maintain confidentiality requirements.

Disclosures outside the scope of this Policy may be referred to other business units.

If someone is named in your report

If your report mentions someone else, that person will be treated fairly and supported throughout the process. They will have the chance to respond to the concerns raised. We will ensure that the investigation is handled as confidentially as possible.

External reports

While we encourage you to report internally, you also have the option to report externally to government organisations like ASIC, ATO, or the Tax Practitioner Board. These organisations provide further details about when and how a whistleblower may make a report on their websites.

You can also seek legal advice if you're unsure about your disclosure or the protections provided to you when speaking up.

You may be eligible to make a Public Interest Disclosure or Emergency Disclosure under certain circumstances and qualify for legal protections. Goodstart encourages you to seek independent legal advice before making such a disclosure to fully understand the criteria for protection under the relevant legislation.

False reports

If someone knowingly makes a false or misleading report, we take this seriously, and it may result in disciplinary action.

Accessibility

This Policy is available on our website and intranet, and it's included in our induction and annual training to make sure everyone knows how to use it.

Whistleblowing contacts

Whistleblower Protection Officers	**Gavin Bartlett**, General Counsel: email gbartlett@goodstart.org.au **Nadine Fiers**, Company Secretary: email nfiers@goodstart.org.au

Responsibilities

Goodstart Board Risk, Audit, Finance and Technology Committee	Monitors the effectiveness of this policy and reviews investigation reports to address broader trends, themes and/or emerging risks highlighted by speak up disclosures.
Goodstart Chief Executive Officer	Ensures systems and processes are in place to support this Policy.
Whistleblowing Protection Officers	Safeguards individuals who speak up, appoints investigators, assesses reports, monitors and reports on the effectiveness of this Policy, and provides the Goodstart Board Risk, Audit, Finance and Technology Committee with periodic reporting on speak up disclosures. This role has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to the Chief Executive Officer, Senior Leadership Team member, or Board member, as may be required.
Eligible Recipients	Receives and refers speak up disclosures to Whistleblowing Protection Officers, ensuring protections are maintained throughout all stages of the process.
All Employees and Contractors	Maintains high ethical standards and report concerns when you see them.

Definitions

Eligible Recipient	Includes Your Call (as the Goodstart Group's nominated independent disclosure hotline), Whistleblower Protection Officers, Goodstart and BFS Children's Services Board Members, the Senior Leadership Team, the Company Secretary, internal or external auditors, actuaries of the Goodstart Group or external regulatory bodies prescribed by regulation.
Emergency Disclosure	Means a disclosure to a journalist or a parliamentarian where: you have previously made a disclosure under this Policy that qualifies for protection; you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and you give us written notification that includes sufficient information to identify the previous disclosure; and states that you intend to make the emergency disclosure to either a member of parliament or a journalist and the extent of the information disclosed in the emergency disclosure is no greater than is necessary to member of parliament or a journalist of the substantial and imminent danger.
Detriment	To a person, means disadvantage to the person and includes injury, damage or loss, damage to property, damage to reputation, intimidation, bullying or harassment, unfavourable treatment in relation to career, profession, employment or trade, discrimination, prejudice or adverse treatment (whether in relation to employment or otherwise), and disciplinary proceedings or disciplinary action.
Public Interest Disclosure	Means a disclosure to a journalist or a parliamentarian where: you have previously made a disclosure under this Policy that qualifies for protection; at least 90 days have passed since the previous disclosure was made; you have reasonable grounds to believe no action is being taken, or has been, taken to address the matter; you have reasonable grounds to believe that making a further disclosure is in the public interest; at the end of the 90 days, you gave us written notification that includes sufficient information to identify the previous disclosure; and states that you intend to make the public interest disclosure to either a member of parliament or a journalist and the extent of the information disclosed in the public interest disclosure is no greater than is necessary to member of parliament or a journalist of the misconduct or the improper state of affairs.