The BUSY School Ltd

Whistleblower Policy

Purpose:	This policy exists to encourage the reporting of corrupt, illegal or other undesirable conduct at The BUSY School Ltd (TBS) under the Whistleblower Protection Regime. This policy outlines how individuals can make disclosures about such conduct appropriately, and how TBS will protect the identity of those individuals and ensure they are protected from detrimental consequences.		
Scope:	The BUSY School Ltd Board, Employees, Workers, Contractors and Service Providers, Other Persons associated with the school, including students and parents and third-party providers.		
Status:	Approved	**Supersedes:**	v2 (February 2023)
Authorised by:	Board Chair	**Date of Authorisation:**	October 2024
References:	• Corporations Act 2001 (Cth) • Taxation Administration Act 1953 (Cth) • Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) • Australian Standard AS8004-2003 Whistleblower Protection Program for Entities(repealed) • TBS Complaints Handling Policy and Procedure • TBS Employee Code of Conduct • TBS Student Code of Conduct		
Review Date:	Bi-Annually	**Next Review Date:**	October 2026
Policy owner:	The BUSY School Ltd		
Related Policies	The Busy Group Whistleblower Policy		

Definitions

Whistleblower Protection Regime – what is it?

The Whistleblower Protection Regime is a regime contained in Part 9.4AAA of the Corporations Act. The regime contains protections for individuals who disclose information regarding suspected wrongdoing or misconduct within an entity where certain requirements are met. The regime applies to all Australian corporations.

Note: Part IVD of the Taxation Administration Act 1953 (Cth) contains a similar whistleblower protection regime in relation to the reporting of information which either assists the Commissioner of Taxation in performing his or her functions and duties or indicates misconduct or an improper state of affairs or circumstances in relation to the tax affairs of a school.

Eligible Whistleblower[1] – Who qualifies for protection?

An individual is an Eligible Whistleblower if she or he has, or has had, a relationship with TBS. This relationship includes an individual being: an officer or employee of TBS, a supplier of services or goods to TBS (whether unpaid or paid (including volunteers), an employee of a person that supplies services or goods to TBS, an associate of TBS[2], and a relative, spouse, and dependant of any of these individuals.

[1] Corporations Act 2001 (Cth), section 1317AAA

[2] Within the meaning of "Associate" given by sections 10 to 17 of the Corporations Act which will generally include a director or secretary, a related body corporate and a director or secretary of a related body corporate.

Disclosable Matter[3] – What kind of disclosures can be made under this policy?

A Disclosable Matter means information based on which an Eligible Whistleblower has reasonable grounds to suspect:

- misconduct (including fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs or circumstances in relation to TBS and, because TBS is a company limited by guarantee (CLG), a related body corporate of TBS;
- that the information indicates that TBS, or an officer or employee of TBS, and, because TBS is a CLG, a related body corporate of TBS or an officer of employee of a related body corporate, has engaged in conduct that:
    - is an offence against, or contravention of, a provision of the Corporations Act or the *Australian Securities and Investments Commission Act 2001* (Cth);
    - is an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
    - represents a danger to the public or the financial system.

A Disclosable Matter **does not** include a **Personal Work Grievance**. A Personal Work Grievance has the same meaning as "personal work-related grievance" as defined in the Corporations Act which, at the date of this policy, means information disclosed relating to the discloser if:

- the information concerns a grievance about any matter in relation to the discloser's employment, or former employment having (or tending to have) implications for the discloser personally; and
- the information does not:
    - have significant implications for TBS; and
    - does not concern a Disclosable Matter.

Eligible Recipients[4] – To whom can a disclosure be made?

Each of the following is an Eligible Recipient in relation to TBS:

- an officer or senior manager of TBS or, because TBS is a CLG, an officer or senior manager of a related body corporate of TBS;
- the auditor or member of an audit team conducting an audit of TBS or, because TBS is a CLG, of a related body corporate of TBS;
- a person authorised by TBS to receive disclosures that may qualify for protection under the Corporations Act, such as the Whistleblower Protection Officer.

Detriment[5]

Detriment refers to unfair action or treatment of an Eligible Whistleblower and includes the following:

- dismissal of an employee;
- injury of an employee in their employment;
- alteration of an employee's position or duties to their disadvantage;
- discrimination between an employee and other employees of the same employer;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position;
- any other damage to a person.

Policy Statement

TBS is committed to maintaining and promoting high standards of integrity, governance and ethical behaviour within the organisation by people at all levels, starting with the governing body, the CEO, Executive Principal, Campus Principal, Senior Management and all other persons employed or engaged by TBS.

TBS is committed to:

[3] Corporations Act 2001 (Cth), section 1317AA (2) (4) (5)
[4] Corporations Act 2001 (Cth), section 1317AAC (3).
[5] Corporations Act 2001 (Cth), section 1317ADA.

- operating legally, and in accordance with all applicable laws and practices;
- properly, in accordance with all organisational policy and procedures; and
- ethically, in accordance with TBS's values and vision.

All TBS employees and associates have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing. Therefore, TBS encourages the reporting of suspected misconduct to the Whistleblower Protection Officer in accordance with this policy.

The responsibilities of the Whistleblower Protection Officer and Whistleblower Investigations Officer do not reside in the same person. They operate, and should be seen and understood to operate, independently of each other and should act in such a way that they discharge the two quite separate functions independently of each other. Training of these positions is provided to ensure awareness of the officer holders' obligations and responsibilities.

When the protections apply

An individual is eligible for protection as a whistleblower under the Whistleblower Protection Regime in relation to a disclosure of information if:

1. he or she is an **Eligible Whistleblower**; and
2. the disclosure is made to an **Eligible Recipient**; and
3. the disclosure concerns a **Disclosable Matter**.

A disclosure made to a legal practitioner (e.g. a lawyer) for the purpose of obtaining legal advice or legal representation in relation to operation of the Whistleblower Protection Regime under the Corporations Act will also be protected[6].

In certain circumstances, the Whistleblower Protection Regime allows Eligible Whistleblowers to make disclosures to professional journalists and members of parliament[7]. These are called “emergency disclosures” and “public interest disclosures”. Strict conditions apply in order for such a disclosure to qualify for protection[8].

Public interest disclosure

An individual will be protected under the Whistleblower Protection Regime if they make a "public interest disclosure" that meets the following conditions:

- the individual is an Eligible Whistleblower and makes an initial disclosure which meets the requirements in items 1 to 3 above in relation to TBS;
- 90 days has passed since the first disclosure was made;
- the individual does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the previous disclosure related;
- the individual has reasonable grounds to believe that making a further disclosure of the information would be in the public interest;
- after at least 90 days from when the first disclosure was made, the individual gives to the person to whom the first disclosure was made written notice that:
    - includes sufficient information to identify the first disclosure; and
    - states that the individual intends to make a public interest disclosure;
- the individual makes the second disclosure to:
    - a member of parliament (either of the Commonwealth or State); or
    - a journalist (meaning a person who is working in a professional capacity as a journalist for a newspaper, magazine, radio or television broadcasting service, or an electronic service which is operated on a commercial basis or by a body that provides a national broadcasting service and which is similar to a newspaper, magazine or radio or television broadcast); and
- the extent of the information disclosed by the individual in making the public interest disclosure is no greater than is necessary to inform the recipient of the Disclosable Matter.

[6] Corporations Act 2001 (Cth), section 1317AA (2)
[7] Corporations Act 2001 (Cth), section 1317AAD (3)
[8] Corporations Act 2001 (Cth), section 1317AAD

Emergency disclosure

An individual will be protected under the Whistleblower Protection Regime if they make an "emergency disclosure" that meets the following conditions:

- the individual is an Eligible Whistleblower and makes an initial disclosure which meets the requirements in items 1 to 3 above in relation to TBS;
- the individual has reasonable grounds to believe that the information concerns a substantial and imminent danger to:
    - the health and safety of one or more persons; or
    - the natural environment;
- the individual gives to the person to whom the first disclosure was made written notice that:
    - includes sufficient information to identify the first disclosure; and
    - states that the individual intends to make an emergency disclosure; and
- the individual makes the second disclosure to:
    - a member of parliament (either of the Commonwealth or State); or
    - a journalist (meaning a person who is working in a professional capacity as a journalist for a newspaper, magazine, radio or television broadcasting service, or an electronic service which is operated on a commercial basis or by a body that provides a national broadcasting service and which is similar to a newspaper, magazine or radio or television broadcast); and
- the extent of the information disclosed by the individual in making the emergency disclosure is no greater than necessary to inform the recipient of the substantial and imminent danger.

How to make a report

TBS is committed to providing a safe, reliable and confidential way of reporting any Disclosable Matters.

A report may be made verbally, including via telephone, or in writing, including by email. The report should include details of: the nature of the allegation(s), the individuals involved, the key facts on which the person making the report has formed the view that a Disclosable Matter exists and involves the individual or individuals named in the report, and the nature and whereabouts of any additional evidence that substantiates the allegation(s).

Reports will be treated confidentially.

- The telephone numbers listed below will be manned only by Eligible Recipients and numbers will not be recorded. Individuals may also send text messages to the telephone numbers listed below. If you wish to remain anonymous, any text messages should be sent from a number that is not known to TBS.
- Written reports sent to the email addresses listed below will only be accessible by Eligible Recipients and password protected. If a reporter wishes to remain anonymous, any emails should be sent from an email address that is unknown to TBS and which does not identify the reporter.

Whistleblower Protection Officer

The HR Manager is appointed as a Whistleblower Protection Officer who safeguards the interests and identity of the eligible whistleblower in terms of this policy and any applicable legislation and any employment policies, as limited by law.

The Whistleblower Protection Officer will have direct, unfettered access to independent financial, legal and operational advisers as required.

The Whistleblower Protection Officer can be contacted by the following means:

- email: whistleblowreport@thebusygroup.com.au
- phone (direct number): 0418 435 423
- in person: Corporate Services

Whistleblower Investigations Officer

The HR Business Partner is appointed as TBS Whistleblower Investigations Officer. Their responsibility is to investigate the disclosure and prepare a report as required under this policy.

The Whistleblower Investigations Officer can be contacted by the following means:

- email: privacy@thebusygroup.com.au
- phone: 0438 869 227
- in person: Corporate Services

Auditor of TBS

Reports can also be made to TBS's auditor, or a member of the audit team.

TBS's auditor can be contacted by the following means:

- email: privacy@thebusygroup.com.au
- phone: 0438 128 422
- in person: Corporate Services

The Whistleblower Protection Officer and the Whistleblower Investigations Officer will report to the next reporting line e.g. the CEO or principal. If this line of reporting is affected by the Disclosable Matter, then the matter would be referred to the CEO or chair of the Board.

An assessment will then be made regarding whether the report qualifies for protection under the Whistleblower Protection Regime and if a formal, in-depth investigation is required.

Anonymous reporting

Whilst the identity of a reporter will enable the Eligible Recipients and Whistleblower Protection Officer to have ongoing communication with a reporter (which will likely assist in the investigation), reporters may remain anonymous. If a reporter wishes to remain anonymous, they should maintain ongoing two-way communication with the Whistleblower Protection Officer so that the officer can ask follow-up questions or provide feedback without knowing the reporter's identity.

TBS will protect the anonymity of a reporter by communicating via an anonymous phone number or email address and allowing the reporter to adopt a pseudonym for the purposes of the disclosure and investigation.

Importantly, disclosures made anonymously will still be protected under the Whistleblower Protection Regime.

False reports

At TBS, an Eligible Whistleblower will not be disadvantaged by making a report unless the report is knowingly false. If the report is false, this will be taken as a serious matter and the reporter will be subject to disciplinary proceedings as per employment policies.

Investigation

TBS will investigate all matters reported pursuant to this policy as soon as practicable once a report has been received and within 7 days of a report being received.

The purpose of the investigation is to determine whether or not the reported concerns or allegations are substantiated, with a view to rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of the reporter and anyone who is implicated in the Disclosable Matter. This includes investigating without bias and any person implicated in the Disclosable Matter will have a right to respond.

The reporter (where possible, having regard to the reporter's request for anonymity) will be kept informed of the outcomes of the investigation arising from their report, subject to considerations of the privacy of anyone who is the subject of the Disclosable Matter and confidentiality requirements. Any reporter who is not an employee must first agree in writing that they will maintain the strict confidentiality of the report and the substance of the report and the investigation before they can be kept informed of the investigation.

Investigation processes will vary depending on the precise nature of the matter being investigated but will generally proceed as follows:

- With the consent of the reporter, the Eligible Recipient will inform the Whistleblower Protection Officer of the report. If the Eligible Recipient determines that this is not appropriate (for example, the information relates to the Whistleblower Protection Officer or the Whistleblower Investigations Officer) they will inform another appropriate, responsible individual e.g. CEO, Principal or Board Chair.
- The Whistleblower Protection Officer will appoint the Whistleblower Investigations Officer or, if the Whistleblower Protection Officer determines that this is not appropriate (for example, the information relates to the Whistleblower Investigations Officer), they will inform another appropriate, responsible individual.
- The Whistleblower Investigations Officer (or other person appointed to investigate the report) will be required to notify the Board of TBS in order to commence the investigation. The identity of the reporter will be protected if required by the reporter.
- Where appropriate, TBS may, in its discretion, provide a reporter with feedback regarding the investigations and outcome.

- An investigation will be conducted in a fair and objective manner, as is reasonable and having regard to the nature of the matter reported, the report made and any relevant circumstances.
- The enquiries made, and the process of the investigation will be determined by the individual/s conducting the investigation having regard to the nature and substance of the report. This may include the investigation being undertaken internally or the appointment of an independent third party.
- If a report is not made anonymously, or the reporter has otherwise provided a means of contact, the Whistleblower Protection Officer will be in contact with the reporter to discuss the investigation process including who may be contacted during the process and other matters relevant to the investigation.
- If the report is made anonymously, and the reporter does not provide a means by which they may be contacted, the investigation will be conducted based solely on the content of the report.
- Throughout the investigation:
    - All information obtained will be properly secured to prevent unauthorised access and disclosure in accordance with this policy;
    - All relevant witnesses will be interviewed, and documents examined;
    - The identity of any individuals named or implicated in the reported conduct will be kept confidential;
    - Witnesses will be directed not to draw inferences regarding the identity of any individuals involved in any alleged misconduct based on the substance of the questions asked;
    - Notes will be made of all discussions, phone calls and interviews;
    - Without the reporter's consent, TBS cannot disclose information that is likely to lead to identification of the reporter as part of its investigation process, unless:
        - the information does not include the reporter's identity;
        - TBS removes information relating to the reporter's identity or other information that is likely to lead to the identification of the reporter (e.g. name, position, title, other identifying details); or
        - the disclosure is authorised under the Whistleblower Protection Regime (for example, the disclosure is made to ASIC, APRA, the AFP or a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the Whistleblower Protection Regime);
        - it is reasonably necessary for the investigation of the issues raised in the disclosure.
- If the reporter has provided contact details or means by which they may be contacted, TBS will provide the reporter with regular updates. The frequency and timeframe of updates will vary depending on the subject matter of the report.
- The Board of TBS will ensure that the investigation is completed within a reasonable time depending on the circumstances and within no less than 90 days of the commencement of the investigation, subject to extraordinary circumstances justifying extension beyond this time.
- A reporter who makes an anonymous report may choose to remain anonymous while making a report, over the course of the investigation and after the investigation is finalised. Accordingly, a reporter can refuse to answer questions that they feel could reveal their identity at any time.
- The investigation process may be subject to some limitations, including that TBS may not be able to undertake an investigation if it is not able to identify the reporter; for example, if a report is made anonymously and the reporter has refused to provide, or has not provided, a means of contact for any further questions or follow up which TBS may need as part of the investigation.
- At the conclusion of the investigation, the Whistleblower Investigations Officer (or other person appointed to conduct the investigation) will prepare a report for the Board of TBS which will include:
    - the allegations;
    - a statement of all relevant findings of fact and the evidence gathered and upon which conclusions have been based;
    - the conclusions reached, including the damage caused, if any, and the impact on TBS and any other affected parties;
    - recommendations, based on the report's conclusions, to address any wrongdoing identified and any other matters that arose during the investigation.
- The report will be provided to the Board of TBS and the reporter (if possible), with any applicable confidentiality stipulations.

Ensuring fair treatment of employees who are mentioned in reports

To ensure that employees who are mentioned in reports are treated fairly, TBS will ensure that the principles of natural justice are adhered to throughout the investigation process whilst maintaining the protection of Eligible Whistleblowers. For example, TBS will ensure that employees named in the reports are provided with details of any allegations made against them along with any relevant evidence substantiating those allegations and affording them a right to respond to the allegations.

Protection of Eligible Whistleblowers

To encourage reporting, TBS is committed to ensuring the confidentiality of all matters raised under this policy and the protection and fair treatment of those who make a report and those named or implicated in a report during the investigation process. Eligible Whistleblowers will be protected as follows:

Protection against detrimental treatment

TBS will not tolerate or permit a person within TBS to:

- engage in conduct that causes Detriment to a reporter (or another person) in relation to a report, if:
    - the person believes or suspects that the reporter (or another person) made, might have made, proposed to make or could make a report that qualifies for protection; and
    - the belief or suspicion is the reason, or part of the reason, for the conduct;
- make a threat (whether express or implied, conditional or unconditional) to cause Detriment to a reporter (or another person) in relation to a report.

Detrimental treatment includes dismissal, demotion, harassment, discrimination, bullying, disciplinary action, threats, bias or other unfavourable treatment connected with making a report under this policy. Detrimental treatment does not include things like genuine performance management or the genuine exercise of legal rights against a person.

If a reporter is subjected to detrimental treatment as a result of making a report under this policy, they should immediately inform the Whistleblower Protection Officer or other individual handling the report.

Protection of reporter's identity and confidentiality

Subject to any legal requirements, on receiving a report under this policy, TBS will only share a reporter's identity as a whistleblower or information likely to identify a reporter if:

- the reporter consents;
- the report is made to ASIC, APRA or the Australian Federal Police; or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

Any disclosures of a reporter's identity or information likely to reveal a reporter's identity will be made on a strictly confidential basis.

TBS will protect the confidentiality of a reporter by:

- reducing the risk that the reporter will be identified from the information contained in the disclosure by:
    - redacting all personal information or reference to the identity of the reporter witnessing an event;
    - referring to the reporter in gender-neutral terms;
    - contacting the reporter to help identify certain aspects of the disclosure that could inadvertently identify them; and
    - ensuring that disclosures are handled and investigated by qualified individuals.
- ensuring that its record-keeping and information sharing processes are adequate to ensure the protection of a reporter's identity, such as by:
    - storing all records securely;
    - ensuring access to all records and information relating to the disclosure is limited to those directly involved in managing and investigating the disclosure;
    - ensuring that only a restricted number of individuals directly involved in the handling and investigation of a disclosure will be aware of the reporter's identity (subject to the reporter's consent) or information which may identify the reporter;
    - ensuring that material relating to the matter will not be sent to an email address or left in a situation (such as at a communal printer) that can be accessed by other individuals; and
    - reminding all individuals involved in the handling and investigation of a matter are regularly reminded of their confidentiality requirements, including that in the circumstances that apply under the

Whistleblower Protection Regime, the unauthorised disclosure of an individual's identity may be a criminal offence.

Protection of files and records

In order to protect the reporter and any individual named or implicated in a report, TBS will ensure that all files and records created from an investigation arising from a report made under this policy will be stored safely and securely and will be appropriately protected having regard to whether the records are stored in electronic form or in paper copy.

This will be achieved by:

- If the files are electronic – ensuring that the system is adequately protected by password protection or encryption, and the files and records are stored on secure data storage systems and accessible only by authorised individuals involved with the investigation or with sufficient security clearance;
- If the files are hard copy – ensuring that the files are stored in locked storage and that the keys to the storage are kept safely and securely in a location only known to authorised individuals involved with the investigation or with sufficient security clearance.

Protections under the Corporations Act

In addition to the above internal mechanisms to protect a reporter, the Corporations Act contains special protections to Eligible Whistleblowers if the conditions in conditions 1,2 and 3 in the section of this policy headed "When the protections apply" are met. These special protections are:

- the Eligible Whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the Eligible Whistleblower for making the disclosure;
- in some circumstances, the disclosed information is not admissible against the Eligible Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty[9];
- anyone who causes or threatens to cause Detriment[10] to an Eligible Whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages;
- an Eligible Whistleblower's identity cannot be disclosed to a court or tribunal except where considered necessary; and
- the person receiving the report commits an offence if they disclose the Eligible Whistleblower's identity or information that is likely to lead to the identification of the Eligible Whistleblower, without the Eligible Whistleblower's consent, to anyone except:
    - ASIC;
    - APRA;
    - the Australian Federal Police (AFP); or
    - a legal practitioner for the purpose of obtaining legal advice or representation in relation to the disclosure.

*However, these protections **do not** grant immunity for any misconduct that an Eligible Whistleblower has engaged in that is revealed in their disclosure.*

TBS will ensure that Eligible Whistleblowers are protected against Detriment by:

- undertaking an assessment of the risk of Detriment against the Eligible Whistleblower and other persons (e.g. other personnel who may be suspected to have made a disclosure) as soon as possible after receiving the disclosure;
- where possible, providing support services to the Eligible Whistleblower e.g. counselling sessions, to assist the Whistleblower to minimise and manage stress;
- where possible, engaging with the Eligible Whistleblower to assist in providing or identifying strategies to minimise and manage time or performance impacts, or other challenges resulting from the disclosure or the

[9] For example, where the disclosure has been made to ASIC or APRA, or where it qualifies as a public interest disclosure or emergency disclosure.
[10] Corporations Act 2001 (Cth), section 1317ADA.

investigation, such as by providing other modifications for the Eligible Whistleblower to continue to work e.g. reassignment to another role, changes to their role or the way they perform their duties;

- ensuring TBS's management is aware of their responsibilities to maintain the confidentiality of a report, address the risks of isolation or harassment, manage conflicts and ensure fairness when managing the performance of, or taking other management action relating to, an Eligible Whistleblower;
- informing the Eligible Whistleblower that they can lodge a complaint with TBS via the Whistleblower Protection Officer if they have suffered Detriment in accordance with TBS's complaints policy. Any complaint will be taken seriously and dealt with by TBS in accordance with that policy.

Confidentiality of a report made under the Corporations Act

If a disclosure is made, the identity of the Eligible Whistleblower must be kept confidential unless one of the following exceptions arises:

- the Eligible Whistleblower consents to the disclosure of their identity;
- disclosure of details that might reveal the Eligible Whistleblower's identity is reasonably necessary for the effective investigation of the Disclosable Matter;
- the concern is reported to ASIC, APRA or the Australian Federal Police (AFP); or
- the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the Whistleblower Protection Regime.

It is illegal for a person to identify a disclosure or disclose information that is likely to lead to the identification of the Eligible Whistleblower, outside these exemptions.

An Eligible Whistleblower may lodge a complaint with TBS about a breach of confidentiality in accordance with TBS's Complaints Handling Policy and Procedure. An Eligible Whistleblower may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO if their confidentiality is not protected.

Compensation/Remedies

An Eligible Whistleblower can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of a disclosure; and
- TBS failed to take reasonable precautions and failed to exercise due diligence to prevent Detrimental conduct.

Awareness and access

TBS will ensure that all its employees have access to this policy through The Hive. In addition, TBS will ensure that all its employees are aware of this policy in the following ways:

- through its induction and continuous training procedures.
- the TBS Staff Code of Conduct includes reference to this policy.
- through regular communications to staff from the CEO, Executive Principal, Campus Principal's and other Senior Managers.
- Listing of relevant roles and contact details at campuses.

Version Control

Version No.	Date Effective	Approved by	Changes
1.0	April 2021	▪ Approved by TBS Board of Directors	▪ Initial draft version
2.0	February 2023	▪ Endorsed by TBS Governance, Compliance and Strategy Committee; ▪ Approved by TBS Board of Directors	▪ Updated email for reporting ▪ Updated communication process ▪ Version Control ▪ Review Date Bi-annually
3.0	October 2024	▪ Endorsed by TBS Governance, Compliance and Risk Committee ▪ Approved by TBS Board of Directors	▪ Reviewed against content in ISQ template, no content changes required ▪ Footer and Version Control information updated