



Bundaberg Christian College
Education with Wisdom

BCC Whistleblower Policy

“EDUCATION WITH WISDOM”

“**Wisdom** is supreme; therefore get wisdom. Though it cost all you have, get **understanding.**”
(Proverbs 4:7)

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Respect | Integrity | Servanthood | Excellence

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PURPOSE

This policy exists to encourage the reporting of corrupt or illegal conduct at the Bundaberg Christian College (the 'College'). It outlines how individuals can appropriately make disclosures about these matters, and how the College will protect those individuals from detrimental consequences.

SCOPE

The College's Board, Officers, Workers, Contractors and Service Providers, Other Persons associated with the school, including students and parents of the College.

REFERENCE DOCUMENTS

Corporations Act 2001 (Cth)

Australian Standard AS8004-2003 Whistleblower Protection Program for Entities

BCC Staff Manual

Taxation Administration Act 1953 (Cth)

BCC Complaints Handling Policy and Procedure

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 Whistleblower¹ – Who qualifies for protection?

An individual is an Eligible Whistleblower if she or he has, or has had, a relationship with the College. This relationship includes an individual being: an officer or employee of the College, a supplier of services or goods to the College (whether unpaid or paid (including volunteers)), an employee of a person that supplies services or goods to the College, an associate of the College², and a relative, spouse, and dependant of any of these individuals.

Disclosable Matter³ – 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 the College and the related body corporate of the College;
- that the information indicates that the College, or an officer or employee of the College, and the related body corporate of the College or an officer or employee of a related body corporate, has engaged in conduct that:

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.*

³ *Corporations Act 2001 (Cth), section 1317AA (5)(c)*

- 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 the College; and
 - does not concern a Disclosable Matter.

Misconduct⁴

"Misconduct" includes conduct that:

- Constitutes an offence against, or a contravention of, a provision of any of the following:
 - The *Corporations Act 2001*;
 - The *Australian Securities and Investments Commission Act 2001*;
 - The *Banking Act 1959*;
 - The *Financial Sector (Collection of Data) Act 2001*;
 - The *Insurance Act 1973*;
 - The *Life Insurance Act 1995*;
 - The *National Consumer Credit Protection Act 2009*;
 - The *Superannuation Industry (Supervision) Act 1993*;
- Constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- Represents a danger to the public or the financial system; or
- Is prescribed by regulations for the purposes of paragraph 1317AA(5) of the *Corporations Act 2001*.
- Indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the College.

Eligible Recipients⁵ – To whom should a disclosure be made?

Disclosures qualify for protection if they are made to eligible recipients. Those belong to the following categories of persons:

- a senior manager of the College
- the Whistleblower Investigations Officer of the College
- an auditor, or a member of an audit team conducting an audit of the College.

Disclosures made to a legal practitioner for obtaining legal advice or legal representation are also protected.

Under exceptional circumstances, the law makes provisions for whistleblowing disclosures to professional journalists⁶ and members of parliament. These are called "emergency disclosures" and "public interest

⁴ *Corporations Act 2001 (Cth), section 1317AA(4)-(5)*

⁵ *Corporations Act 2001 (Cth), section 1317AAC*

⁶ *Corporations Act 2001 (Cth), section 1317AAD (3)*

disclosures”; however, they require strict adherence to prescribed processes before being made to qualify for protection⁷.

Detriment⁸

This policy seeks to prevent Whistleblowers from Detriment as a result of the whistleblowing, which includes the following:

- dismissal of an employee
- injury of an employee in his or her employment
- alteration of an employee’s position or duties to his or her 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

The College 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 principal, and senior management. The College is, therefore, encouraging the reporting of wrongdoing through appropriate channels.

The College is committed to complying with the applicable laws and practices included in the *Corporations Act 2001* and *Australian Standard AS8004-2003 Whistleblower Protection Program for Entities*.

All of the College employees and associates have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing.

Bundaberg Christian College is committed to operating:

- legally, and in accordance with all applicable laws’
- properly, in accordance with all organisational policy and procedures; and
- ethically, in accordance with the College’s values and vision.

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

Whistleblower Investigations Officer

The Principal is appointed as a ‘Whistleblower Investigations Officer’ and will investigate the substance of the complaint to determine whether there is evidence in support of the matters raised or to refute the report. In the event a matter involves the Principal, the appointed investigator will be the Board Chair.

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

- *email:* paul.thompson@bcc.net.au
- *phone:* 07-4132 5800
- *in person:* 234 Ashfield Road, Bundaberg
- *anonymously:* mail to the Principal, 234 Ashfield Road, Bundaberg

⁷ *Corporations Act 2001 (Cth), section 1317AAD*

⁸ *Corporations Act 2001 (Cth), section 1317ADA*

Nominated Whistleblower Protection Officers

The Human Resource and Compliance Manager is appointed as a 'Whistleblower Protection Officer' to receive reports of Misconduct and will safeguard the interests of the Eligible Whistleblower in terms of this policy and any applicable legislation and standards. The Whistleblower Protection Officer will be readily accessible by all staff and 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:* andrew.iles@bcc.net.au
- *phone:* 07-4132 5800
- *in person:* 234 Ashfield Road, Bundaberg
- *other:* mail to the Human Resource and Compliance Manager, 234 Ashfield Road, Bundaberg

The responsibilities of the Whistleblower Protection Officer and Whistleblower Investigations Officer will not reside in the same person. They should operate, and be seen 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.

Reporting

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

A report under this policy can be made if individuals falling into the category of Eligible Whistleblower have grounds to suspect that Disclosable Matters have taken place.

A report can be made to any of the following persons, noting it may depend on the matter and the person who is the subject of the matter:

- Principal/Head of School
- Whistleblower Protection Officer
- Board Chair: board@bcc.net.au
- other Eligible Recipients as defined above.

At any stage, a person in the list above can be skipped if that person is the subject of the report or if the Whistleblower has another reason to believe that the person is not likely to deal with the report properly. While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with the Whistleblower about the report.

The Whistleblower Protection Officer will report to the next reporting line e.g. the Principal / Board Chair, in accordance with this policy. 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.

In addition to making a report through normal reporting channels or to the Whistleblower Protection Officer, an Eligible Whistleblower may wish to make a report of Misconduct within the College to an external body. For example, by submitting a tip-off form to the Australian Tax Office. Disclosures made to an external body will not be investigated by the College pursuant to this policy, but whistleblowers will be afforded the protections set out in this policy to the extent that the College is made aware of the identity of the whistleblower.

Anonymous reporting

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

Bundaberg Christian College will endeavour to protect the anonymity of a report 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 Bundaberg Christian College 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 may be subject to disciplinary proceedings in accordance with College disciplinary policies and practices.

Investigation

Investigation processes will vary, and conducted either internally or externally, depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not concerns are substantiated, with a view to rectifying any misconduct uncovered to the extent that this is practicable in all the circumstances within **7 school days** of a report being received.

The investigation will be thorough, objective, fair and independent of the Whistleblower and anyone who is the subject of the Disclosable Matter. The investigation will also have proper regard to the principles set out in the *Australian Standard AS8004-2003 on Whistleblower Protection Program for Entities*.

Where the Whistleblower Protection Officer determines that a report is trivial, vexatious or baseless, the Whistleblower Protection Officer will inform the whistleblower of this assessment, and no further action will be taken in relation to the report.

The Whistleblower will receive feedback regarding the investigation arising from their report, subject to considerations of the privacy of anyone who is the subject of the Disclosable Matter and standard confidentiality requirements.

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 the following investigation processes will apply:

- With the consent of the reporter, the Eligible Recipient will inform the Whistleblower Protection Officer of the disclosure. 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. Principal or Chair of the Board.
- The Whistleblower Investigations Officer (or other person appointed to investigate the report) will be required to notify the Board Chair in order to commence the investigation. The identity of the reporter will be protected if required by the reporter.
- 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.

- Investigations must be conducted in a fair and transparent manner, affording principles of natural justice to any persons implicated in a report of Misconduct and preserving the confidentiality (to the greatest extent possible) of the person.
- 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. 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.
- 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.
- Investigations regarding reports made pursuant to this policy should be completed **within 21 days** of the appointment of an investigator. If for any reason an investigation cannot be completed within 21 days, the whistleblower must be informed of the delay by the Whistleblower Protection Officer if the reporter does not remain anonymous.
- Throughout the investigation:
 - All information obtained will be properly secured to prevent unauthorised access and disclosure.
 - All relevant witnesses will be interviewed and relevant documents examined.
 - The identity of any individuals named or implicated in the reported conduct will be kept confidential (to the greatest extent possible).
 - 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.
- The investigation must be completed within a reasonable time depending on the circumstances and within **no more than 60 days** of the commencement of the investigation, subject to extraordinary circumstances justifying extension beyond this time.
- 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 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 the College and any other affected parties; and
 - 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 as soon as practicable, and the reporter if appropriate 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, the College will ensure that the principles of natural justice and procedural fairness are adhered to throughout the investigation process whilst maintaining the protection of Eligible Whistleblowers. For example, the College 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,
- affording those employees a right to respond to the allegations,
- Advising those employees of the outcome of the investigation.

Protections

The Australian Securities & Investment Commission (ASIC) provides general information about [protections available to whistleblowers](#).

When the Protections Apply

The protections available under the *Corporations Act 2001 (Cth)* apply to a disclosure only when all three of the following conditions are met:

1. The Discloser is an Eligible Whistleblower

The individual making the disclosure is an Eligible Whistleblower under this policy.

2. The Disclosure is Made to an Eligible Recipient or Authority

The disclosure is made to:

- The Whistleblower Protection Officer;
- The Whistleblower Investigations Officer;
- A senior manager of the College;
- The College's auditor or audit team member;
- The Board Chair;
- A legal practitioner for the purpose of obtaining legal advice or representation; or
- A regulator such as ASIC, APRA, or the Australian Federal Police (AFP).

3. The Disclosure Relates to a Disclosable Matter

The disclosure concerns a Disclosable Matter as defined in this policy, and the discloser has reasonable grounds to suspect the information relates to:

- Misconduct,
- An improper state of affairs or circumstances in relation to the College, or
- A breach of Commonwealth legislation or conduct that represents a danger to the public or financial system.

Protection of Eligible Whistleblowers

To encourage reporting, the College is committed to ensuring the confidentiality to the greatest extent possible 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

Bundaberg Christian College will not tolerate or permit a person within the College 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, victimisation 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, the College 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;
- otherwise as required by law; 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.

Bundaberg Christian College 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 investigated by senior/experienced 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 a shared 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, the College 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 2001 (Cth)*

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.
- Anyone who causes or threatens to cause Detriment 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.
- 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.*

The College 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 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 the College 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 the College via the Whistleblower Protection Officer if they have suffered Detriment in accordance with BCC Complaints Policy. Any complaint will be taken seriously and dealt with by the College in accordance with that policy.

Confidentiality of a report made under the *Corporations Act 2001 (Cth)*

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);
- 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, or
- Is otherwise required by law.

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 the College about a breach of confidentiality in accordance with *BCC Complaints Handling Policy*. 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 or 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
- the College failed to take reasonable precautions and failed to exercise due diligence to prevent Detrimental conduct.

Awareness and access

Bundaberg Christian College will ensure that all officers and employees are made aware of, and have ready access to, this policy through the following measures:

- Inclusion in new staff induction materials, with a copy provided to all new employees;
- Availability on the College intranet (Teacher Kiosk) for ongoing reference;
- Regular communication with all staff at least **every two years**, as part of the College's professional practice updates;
- Reference to this policy within the *BCC Staff Code of Conduct*;
- Public access via the College website;
- Ongoing awareness through compliance and professional development training.

These measures support the College's commitment to transparency and encourage a culture where concerns can be raised safely and appropriately.