

Whistleblower Policy

Authorisation Date: 04/2023

OSG Document Code: POL_NZ_HR_Whistleblower Policy_v1.2

Region: New Zealand

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Local Document Code (if applicable) XXXXXXX	Approval Authority RMD OneSchool Global New Zealand/ Argentina	Document Author HR Team
Enquiries Contact: hr.support@nz.oneschoolglobal.com	Associated Documents Code of Conduct Policy Anti-bullying/Child Protection Policy Concerns and Complaints Policy Protected Disclosures (Protection of Whistleblowers) Act 2022 Whistleblower Policy Guideline	

1. DEFINITIONS

Term	Definition
OSG NZ	OneSchool Global New Zealand.
Staff	Any person that is employed by OSG NZ, including teachers and other employees, contractors, and volunteers.
Reportable Conduct	The types of conduct set out in section 5 of this Whistleblower Policy.
Whistleblower	Any person, whether they are a Staff member or otherwise, that makes an allegation of Reportable Conduct.
Policy	This Whistleblower Policy.

2. GENERAL

This Policy been put in place to ensure Staff or other Whistleblower can raise concerns to OSG NZ regarding any serious risk to health and safety, or misconduct, improper situations or circumstances (including unlawful, corrupt, fraudulent conduct) without being subjected to victimisation, retaliation, harassment, discriminatory treatment, or otherwise treated less favourably.

This Policy is adopted to provide a safe and confidential environment where such concerns can be raised by a Whistleblower without fear of reprisal or detrimental treatment. It also aims to develop practices that reduce the risk of Reportable Conduct within OSG NZ, and safeguard the reputation, values, and ethics of OSG NZ.policy objectives

This Policy provides any Whistleblower with a clear framework within which to make an allegation as a “protected disclosure”, to:

- Ensure any reports of Reportable Conduct are lawfully investigated and addressed as soon as possible;
- Provide a Whistleblower with a clear understanding of how allegations will be handled;
- Protect a Whistleblower from victimisation and retaliation;
- Support a Whistleblower throughout the reporting process;
- Afford natural justice and procedural fairness to anyone who is the subject of an allegation of Reportable Conduct.

- (f) Provide reasonable protections for a Whistleblower who, acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true, raises concerns about Reportable Conduct; and

3. PROTECTION OF A WHISTLEBLOWERS

A protected disclosure is made when a Whistleblower makes an allegation of Reportable Conduct in accordance with this Policy. Nothing in this Policy is intended to abrogate or diminish any additional or alternative protections which may be available at law.

To be protected under this policy, a Whistleblower must:

- (a) Be acting honestly with genuine or reasonable belief that the information in the allegation is true or likely to be true;
- (b) Make the disclosure in accordance with this Policy; and
- (c) Not make the disclosure in bad faith.

OSG NZ promotes a culture that encourages the notification of Reportable Conduct. Where a Whistleblower makes a protected disclosure, that person will be protected from disciplinary action, victimisation, retaliation or disadvantage by OSG NZ as a result of having made the disclosure. During the process, the Whistleblower must continue to comply with this Policy.

In circumstances where, for any reason, the identity of the Whistleblower is known outside of the investigation process, OSG NZ will take reasonable steps to protect the Whistleblower from retaliatory or discriminatory action where it has sufficient authority to do so.

4. REPORTABLE CONDUCT

OSG NZ relies on its Staff and community to help maintain and grow its culture of honest and ethical behaviour. It is therefore expected that any Whistleblower who becomes aware of, or suspects, Reportable Conduct will make a protected disclosure.

Reportable Conduct includes, but is not limited to, any conduct that involves:

- (a) Theft, fraud, money laundering, misappropriation, or other improper or misleading accounting / financial reporting practices;
- (b) Unlawful, corrupt, or irregular use of OSG's funds or practices;
- (c) Illegal or unlawful activities (including dealing in or use of illicit drugs, violence or threatened violence, and criminal damage against property);
- (d) Offering or accepting a bribe;
- (e) Unethical behaviour, including anything that would breach the OSG NZ Code of Conduct & business ethics, and behaviour that is oppressive, discriminatory, or grossly negligent;
- (f) Victimising or retaliating against someone for notifying a Reportable Conduct;
- (g) An unsafe work-practice or any behaviour that poses a serious risk to the health and safety of any person at the workplace;
- (h) A serious risk to public health, public safety, or the environment;
- (i) Any instruction to cover up or attempt to cover up serious wrongdoing; and
- (j) Any other conduct which may cause significant loss to OSG NZ or be otherwise detrimental to the interests of OSG NZ.

This Policy extends to serious wrongdoing as defined in relevant legislation, that occurs before or after the commencement of this Policy and is not limited to the above examples.

Personal grievances are not covered under this Policy and should be reported in the first instance to your line manager or Human Resources in accordance with the Grievance Process.

5. MAKING A DISCLOSURE

Sometimes, a suspicion of wrongdoing may arise from a misunderstanding and does not in fact meet the definition of Reportable Conduct. Accordingly, Staff are encouraged to first consider reporting any matters of concern to their direct line manager or local Human Resources representative.

5.1 Reporting to Eligible Recipients

A disclosure of Reportable Conduct can be made to an “eligible recipient” within the organisation. Eligible Recipients at OSG NZ are:

- (a) Senior Managers;
- (b) Directors;
- (c) An OSG NZ Board member;
- (d) Member of the management team;
- (e) Regional Principal; or
- (f) A Whistleblower Investigation Officer.

Reports to an Eligible Recipient must be made in person, by telephone, or email. The Whistleblower should first inform the Eligible Recipient that they wish to make a protected disclosure under this Policy.

5.2 Reporting to the Whistleblower Investigation Officer

OSG NZ has appointed Whistleblower Investigation Officers who will:

- (a) Safeguard the interests of a Whistleblower;
- (b) Assess the immediate welfare and protection needs of a Whistleblower and seek to foster a supportive work environment; and
- (c) Respond as appropriate and necessary to any concerns or reports of victimisation by a Whistleblower.

The OSG NZ Whistleblower Investigation Officers are:

- Andre Du Toit, Regional Director of Human Resources, OneSchool Global New Zealand
Contact details: M. +64 (0)21 222 6941 or andre.dutoit@nz.oneschoolglobal.com
- Matt Morrison, Regional Director of Education, OneSchool Global New Zealand/ Argentina
Contact details: M. +64 (0)21 839 603 or matt.morrison@nz.oneschoolglobal.com
- Harvey Cottle, Regional Director of Operations, OneSchool Global New Zealand
Contact details: M+64 (0)21 245 2015 or harvey.cottle@nz.oneschoolglobal.com

5.3 Consequences of Making a False Report

Anyone who knowingly makes a false report of Reportable Conduct, or who otherwise fails to act honestly with reasonable belief in respect of the report may be subject to disciplinary action, including possible termination of employment.

5.4 Reports concerning certain individuals

If a protected disclosure involves the Regional Managing Director or a Whistleblower Investigation Officer, this will be directed to the OSG NZ Managing Director for investigation and further action.

5.5 Reports to Other Bodies

In certain circumstances a Whistleblower may have a legal obligation to make a report to a statutory body or government department. A Whistleblower should ensure that they comply with all such reporting requirements.

The Whistleblower Investigation Officer can advise a Whistleblower on the reporting obligations.

5.6 Acknowledgement

The Eligible Recipient or the assigned Whistleblower Investigation Officer will aim to acknowledge receipt of the protected disclosure within 20 working days. If this is not possible, the Whistleblower will be updated as appropriate.

6. INVESTIGATING A DISCLOSURE

6.1 All Information Referred to a Whistleblower Investigation Officer

If another person (such as a supervisor or manager) receives notification of Reportable Conduct pursuant to this Policy, it must be referred to the Whistleblower Investigation Officers and include, at a minimum, the following details:

- (a) The date the Whistleblower made the protected disclosure;
- (b) The date and substance of the Reportable Conduct;
- (c) The identity and position title of the alleged wrongdoer;
- (d) The level of risk associated with the alleged wrongdoing; and
- (e) If the Whistleblower has made a report on the same matter anywhere else.

6.2 Initial Review by Whistleblower Investigation Officer

The Whistleblower Investigation Officers will determine whether sufficient information exists to allow the protected disclosure to be investigated, whether an investigation is required, and, if so, determine the appropriate investigation process, including:

- (a) The nature and scope of the investigation;
- (b) Who will conduct the investigation and whether that person should be external to OSG NZ;
- (c) The nature of any technical, financial, or legal advice that may be required; and
- (d) An estimated timeframe for the investigation (having regard to the allocated level of risk).

6.3 Update on Progress of Investigation

The Whistleblower Investigation Officer will inform the Whistleblower whether the matter is being investigated or addressed, or referred elsewhere, or if it has been determined that no action is required.

6.4 Use of External Professionals During Investigation

An external professional(s) may be engaged, to assist with, or conduct, the investigation process.

OSG NZ may be required to refer an allegation of Reportable Conduct to the Police or other agencies. In such circumstances, OSG NZ may not be able to keep a Whistleblower informed on the progress of a protected disclosure. The timing of an investigation will depend on the circumstances of the matter and whether OSG NZ is the primary investigator of the disclosure.

6.5 Investigation Findings

The person leading any investigation will report their findings to the relevant Whistleblower Investigation Officer and advise the recommended course of action (if any) that OSG NZ should take in response to the findings. Such action may include a disciplinary process or another form of escalation of the report within or outside of OSG NZ.

A Whistleblower Investigation Officer will determine the action (if any) to be taken. If appropriate, and subject to any applicable confidentiality, privacy, or legal constraints, the Whistleblower Investigation Officer may notify the Whistleblower of the conclusion of the investigation and the action taken.

6.6 Record Keeping and Accountability

OSG NZ will establish and maintain a record of all protected disclosures received, the investigation process undertaken, and any actions taken to resolve the matter. This will be kept confidential at all time.

7 CONFIDENTIALITY AND PRIVACY

7.1 Whistleblower identity must be kept confidential

OSG NZ will make all reasonable efforts, as required under the *Protected Disclosures (Protection of Whistleblowers) Act 2022*, to ensure the identity of a Whistleblower remains confidential throughout the investigation process.

However, the Whistleblower's identity does not need to be kept confidential, if:

- (a) The Whistleblower consents to the disclosure of their identity;
- (b) Disclosure of the Whistleblower's identity is compelled by law or the effective investigation of the disclosure (i.e. natural justice requirements);
- (c) Disclosure is necessary to prevent a serious threat to any person's health or safety or the environment; or
- (d) It is necessary to protect or enforce OSG NZ's legal rights or interests or to defend any claims.

The Whistleblower will be consulted with before any information that may identify the Whistleblower is released, in accordance with the *Protected Disclosures (Protection of Whistleblowers) Act 2022*.

Unauthorised disclosure of the Whistleblower's identity or information, from which the identity of the Whistleblower may be determined, will be taken seriously, and will be dealt with in accordance with OSG NZ's disciplinary procedures.

7.2 Report must be kept confidential

Any supervisor or manager who receives a protected disclosure must not disclose that report to anyone other than a Whistleblower Investigation Officer. Unauthorised sharing will be taken seriously, and will be dealt with in accordance with OSG NZ's disciplinary procedures.

A Whistleblower must keep all information relating to any allegation confidential at all times, both during any investigation process and following any resolution of an allegation. Any breach of this requirement will be taken seriously, and will be dealt with in accordance with OSG NZ's disciplinary procedures.

8 PROTECTIONS TO A WHISTLEBLOWER

No Staff member may engage in detrimental conduct against a Whistleblower who has made or proposes to make a protected disclosure in accordance with this Policy.

All reasonable steps will be taken to ensure that a Whistleblower will not be subjected to any form of victimisation, discrimination, harassment, demotion, dismissal, prejudice, or less favourable treatment because they have made a protected disclosure. However, this Policy will not protect the Whistleblower if they are also involved in or connected to the Reportable Conduct.

8.1 Support for a Whistleblower may include:

- (a) Connecting the Whistleblower with access to the Employee Assistance Program (EAP) (<https://login.lifeworks.com/>) OR 0800 000 136).
- (b) Appointing an independent support person from the Human Resources team to deal with any ongoing concerns they may have.
- (c) Connecting the Whistleblower with third party support providers.

Use of these support services by a Whistleblower may require the Whistleblower to consent to disclosure of their identity or information that is likely to lead to the discovery of their identity.

8.2 Prohibition against Victimisation

OSG NZ is committed to ensuring that any person who notifies Reportable Conduct, acts as a witness, or participates in any way with respect to a report of Reportable Conduct is not victimised.

OSG NZ will thoroughly investigate reports of victimisation. If proven, any person or persons who have victimised a Whistleblower may be subject to disciplinary action or dismissal.

9 IMPLICATED

9.1 Person(s) Implicated

No action will be taken against a Staff member who is implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated.

However, a Staff member who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department, or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee must be immediately reinstated to full duties.

9.2 Disclosures Relating to Person Implicated.

Any disclosure that implicates a Staff member must be confidential, even if the Whistleblower has consented to the disclosure of their identity and should only be disclosed to those persons who have a need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report. A Staff member who is implicated in a disclosure has a right to be informed of the allegations against them and must be given an opportunity to respond to those allegations and provide additional information, if relevant, during an investigation into those allegations, subject to the Whistleblower's right to anonymity.

9.3 Support available for a person implicated include:

- (a) Connecting the Whistleblower with access to the Employee Assistance Program (EAP) (<https://login.lifeworks.com/>) OR 0800 000 136).
- (b) Appointing an independent support person from the Human Resources team to deal with any ongoing concerns they may have.
- (c) Connecting the Whistleblower with third party support providers.

10 CONSEQUENCES FOR NON-COMPLIANCE WITH POLICY

Any breach of this Policy will be taken seriously and could result in counselling and/or disciplinary action, up to and including summary dismissal.

Any alleged breach of this Policy will be taken seriously and may be the subject of a separate investigation.

11 COMMUNICATION OF POLICY

It is a requirement that all Staff comply with this Policy at all times. However, this Policy does not form part of any agreement or contract and nor does it constitute terms and conditions of any person's employment or engagement with OSG NZ.

This Policy will be made available to all Staff in electronic form via the OSG NZ intranet.

12 REPORTING REQUIREMENTS

Subject to confidentiality and privacy obligations and as required under the *Protected Disclosures (Protection of Whistleblowers) Act 2022* or any other law, a report of investigation(s), and actions taken as a result of the investigation(s), will be provided to the Regional Managing Director for OSG NZ.

13 VERSION CONTROL

Policy Code	Date	Version No.	Nature of Change
POL_NZ_HR_v1.0	01/04/2023	1.0	Initial Policy
POL_NZ_HR_v1.2	28/04/2025	1.2	Review