

## Whistleblower Procedure Schedule 1 - Types of Disclosures

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(1) This Schedule describes the types and nature of disclosures that can be made under the Whistleblower Procedure.

|                              | Victorian Public Interest Disclosure Act 2012                                                                                              | Commonwealth Corporations Act 2001                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Who does it apply to         | RMIT University                                                                                                                            | RMIT's Australian controlled entities – RMIT Online, RMIT<br>University Pathways                                                                                                                                                                                                                                                                                                                                                                                                                          |
| What can be<br>disclosed     | Improper conduct or detrimental action by RMIT University or its current or former council members or employees Improper conduct includes: | <ul> <li>Actual or suspected misconduct, or an improper state of affairs or circumstances in relation to the RMIT controlled entity or the RMIT Group.</li> <li>Information that the RMIT controlled entity, the RMIT Group or any of their employees has committed an offence against certain legislation (including the Corporations Act) or that is punishable by 12 months' imprisonment or more or has engaged in conduct that represents a danger to the public or the financial system.</li> </ul> |
| Who can make a<br>disclosure | Anyone (an individual or group of individuals)                                                                                             | Current or former:  • employees of the RMIT controlled entity  • associates of RMIT  • contractors and suppliers, or employees of a contractor or supplier, who has supplied goods or services to the RMIT controlled entity  • a spouse, relative or dependant of RMIT controlled entity employees, contractors or employees of contractors.                                                                                                                                                             |

|                                      | Victorian Public Interest Disclosure<br>Act 2012                                                                                                                                                                                                                                                                                                        | Commonwealth Corporations Act 2001                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Who can a disclosure<br>be made to   | <ul> <li>IBAC</li> <li>Victorian Ombudsman</li> <li>Integrity Oversight Victoria</li> </ul>                                                                                                                                                                                                                                                             | <ul> <li>The Whistleblower Coordinator</li> <li>Senior managers at RMIT who make, or participate in making, decisions that affect the whole or a substantial part of RMIT or who has the capacity to significantly affect RMIT's financial standing</li> <li>'Stopline', a business that is an independent external recipient of disclosures.</li> <li>RMIT's internal or external auditor</li> <li>Legal practitioners</li> <li>Members of Commonwealth and State Parliaments (under certain conditions).</li> <li>The Australian Securities and Investments Commission</li> <li>Journalists.</li> </ul>                 |
| Can a disclosure be made anonymously | Yes                                                                                                                                                                                                                                                                                                                                                     | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Who can a disclosure be made about   | RMIT University, its Council members and employees                                                                                                                                                                                                                                                                                                      | The RMIT controlled entity, RMIT Group or any of their employees                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| What protections are provided        | <ul> <li>Your report will be kept confidential and IBAC will never publicise your name.</li> <li>You, your family, friends and colleges will be protected from being fired or bullied for making the public interest disclosure.</li> <li>You will be immune from any legal action in relation to you making the public interest disclosure.</li> </ul> | Prevents anyone:  • identifying you as a whistleblower, or disclosing any information which is likely to lead to you being identified as a whistleblower  • victimising you because you've made a whistleblower report. This includes dismissing you, altering your position or duties to your disadvantage, discriminating against you, harassing you, intimidating you or damaging your reputation  • enforcing any civil, criminal or administrative liability against you for making the whistleblower report  • enforcing or exercising any contractual or other remedy against you on the basis of your disclosure. |

## **Status and Details**

| Status             | Current                                 |
|--------------------|-----------------------------------------|
| Effective Date     | 27th June 2025                          |
| Review Date        | 27th June 2030                          |
| Approval Authority | Manager, Central Policy                 |
| Approval Date      | 11th June 2025                          |
| Expiry Date        | Not Applicable                          |
| Policy Owner       | Fiona Notley<br>Chief Operating Officer |
| Policy Author      | Alison Huitfeldt<br>General Counsel     |
| Enquiries Contact  | Central Complaints and Investigations   |

## **Glossary Terms and Definitions**

**"RMIT Group"** - RMIT University and its controlled entities (RMIT Europe, RMIT Online, RMIT Vietnam, RMIT University Pathways)