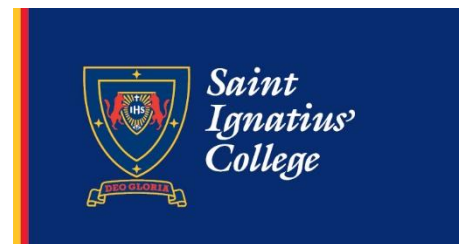

Whistleblower Policy

Version 1.2



Go, set the world *alight*.

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PURPOSE

- The purpose of this Policy is to help deter wrongdoing, in line with the Jesuit Code of Conduct, the Province Whistleblower Principles and Template Policy, and Saint Ignatius' College (Adelaide) Ltd Risk Management Framework and to ensure that any individuals at the College who disclose wrongdoing which amounts to Reportable Conduct in relation to the College can do so safely, securely and with confidence that they will be protected and supported.
- The aim of this Policy is to help individuals feel confident about raising concerns internally, by offering a reporting and investigative mechanism that is objective, confidential, independent and protects individuals from reprisal or disadvantage.
- Under this Policy:
 - individuals are encouraged to report Reportable Conduct, whether openly or, if preferred, anonymously;
 - if an individual reports Reportable Conduct, he or she will be afforded confidentiality unless indicated (or the law requires) otherwise;
 - Such reports will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible;
 - individuals will be advised of the outcome of the investigation and any action taken as much as practicable; and
 - individuals will not be victimised or adversely affected because of the action in reporting concerns provided of course, that there is a basis for the concerns, and that the individual has acted in good faith and without malicious intent.
- This Policy will be published on the Saint Ignatius' College (Adelaide) Ltd website and made available to College Board members and employees. Training will be provided to Saint Ignatius' College employees.
- The People and Culture Manager has been designated as a contact point where employees can seek accurate and confidential advice or information about the following, without making a disclosure:
 - How this whistleblower policy works;
 - What this whistleblower policy covers; and
 - How a disclosure might be handled.

RELATED POLICIES

- Complaints or allegations of staff misconduct that do not meet the criteria of a whistleblowing disclosure will be addressed in accordance with the Saint Ignatius' College (Adelaide) Ltd Reporting and Resolving Complaints Policy and Procedures.
- Disclosures about breaches of child protection conduct and similar legislation shall be reportable under the Children and Young People (Safety) Act 2017 and will be addressed in accordance with the Saint Ignatius' College (Adelaide) Ltd Province Code of Conduct and the College's Child Protection Policy and all CESA policies related to Safeguarding. Disclosures regarding a grievance between staff members about work matters, including work relationships, bullying and harassment and decisions made by other staff members that impact on their work, may be addressed in accordance with the Catholic Education SA Responding to Discrimination, Bullying & Harassment in the Workplace Procedure.
- Complaints of unauthorised data disclosures may be addressed in accordance with the Saint Ignatius' College (Adelaide) Ltd Privacy Policy.

KEY REQUIREMENTS – DISCLOSABLE MATTERS

- All Jesuits and Partners in Mission involved in Saint Ignatius' College (Adelaide) Ltd have a responsibility to help detect, prevent, and report instances of suspicious activity or wrongdoing which amount to Reportable Conduct .
- Under the *Corporations Act 2001 (Cth)* (**Corporations Act**) to be eligible for whistleblower protection, the individual must be an 'eligible whistleblower', the report must be made to an eligible recipient or to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of this Policy and the conduct reported must be Reportable Conduct.
- It is expected that Jesuits and Partners in Mission involved in Saint Ignatius' College (Adelaide) Ltd who become aware of actual or suspect on reasonable grounds, a potential reportable conduct, will make a report under this Policy or under other applicable policies.

Who is an eligible whistleblower?

An eligible whistleblower is an individual who is or has been any of the following, in relation to the Saint Ignatius' College (Adelaide) Ltd:

- a current or former College Board member or Company Secretary;
- A current or former employee;
- a person who supplies goods or services (paid or unpaid);
- an employee of a person who supplies goods or services (paid or unpaid);
- an individual who is an associate of the Saint Ignatius' College (Adelaide) Ltd (as defined in the Corporations Act); and
- a relative or dependent (or dependents of a spouse) of any individual described above.

What is a qualifying Reportable Conduct?

An eligible whistleblower may make a report under this Policy if they have reasonable grounds to suspect that a director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Saint Ignatius' College (Adelaide) Ltd has engaged in conduct which is misconduct or improper, including conduct that is:

- dishonest, fraudulent or corrupt, including bribery;
- illegal (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- unethical or in breach of Province or Saint Ignatius' College (Adelaide) Ltd policies (such as dishonestly altering records or data, adopting questionable accounting practices or wilfully breaching the Province Code of Conduct or other policies or procedures and significant regulatory and legal obligations);
- Misconduct which is potentially damaging to Saint Ignatius' College (Adelaide) Ltd, an employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of property or resources;
- may cause financial loss to Saint Ignatius' College (Adelaide) Ltd or damage its reputation or be otherwise detrimental to its interests
- involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the Corporations Act.

Reports of Personal work related grievances do not usually qualify for protection. A personal work related grievance should generally be dealt with using the Catholic Education SA Responding to Discrimination, Bullying & Harassment in the Workplace Procedure. Examples of personal work related grievances that do not qualify for protection include:

- an interpersonal conflict between the discloser and another employee;
- a decision relating to the engagement, transfer or promotion of the discloser;
- a decision relating to the terms and conditions of engagement of the discloser;
- a decision to suspend or terminate the engagement of the discloser, or otherwise discipline the discloser.

Reasonable Grounds to Suspect

Whether an Eligible Whistle-blower would have 'reasonable grounds to suspect' is based on the reasonableness of their suspicion, having regard to all the circumstances when considered objectively.

If a disclosure is made without 'reasonable grounds to suspect', the Eligible whistleblower will not have the protections provided for under this Policy and the Corporations Act. Any deliberate false reporting will be regarded very seriously.

An Eligible Whistleblower can still qualify for protection even if their disclosure turns out to be incorrect.

WHO CAN I MAKE A REPORT TO?

- To be eligible for whistleblower protection, the report must be made to an Eligible Recipient as defined in this Policy.
- The Province, through its entity, The Society of Jesus in Australia (**SOJA**), provides a number of services to Saint Ignatius' College (Adelaide) Ltd to assist in our governance, including an "arm's length" Disclosures Panel for the purpose of investigating any Reportable Conduct. Consequently, Saint Ignatius' College (Adelaide) Ltd has several channels for making a report if an eligible whistleblower becomes aware of any issue or behaviour which they consider to be a Reportable Conduct:
 - Saint Ignatius' College (Adelaide) Ltd encourages disclosure to an Eligible Recipient in writing, to the College Principal, via email at principal@ignatius.sa.edu.au.
 - If it is not appropriate for the disclosure to be made to the College Principal, the eligible whistleblower is encouraged to make the disclosure, in writing, to the Chair of the College Board, via email at chair@ignatius.sa.edu.au.
 - At any time, the eligible whistleblower can make a report directly to the Province through the Protected Disclosure Officers (detailed below) who, with the Provincial, form the Protected Disclosures Panel.

Where a disclosure is made to an Eligible Recipient locally, such as the College Principal or the Chair of the College Board, then subject to the confidentiality protections set out at Section 6 below, it will be notified to the Province's Disclosure Panel and dealt with in accordance with Section 5 below.

Protected Disclosure Officers

Contact details

- Province Director of Professional Standards
Phone: 03 9810 7300
Email: professionalstandards@sjasl.org.au
- Province Socius
Phone: 03 9810 7300
Email: socius@sjasl.org.au
- Province Manager of Human Resources
Phone: 03 9810 7300
Email: humanresources@sjasl.org.au
- If the disclosure concerns conduct of the Provincial, the Superior General of the Society of Jesus [Reports to be posted to Borgo S. Spirito 4, 00193, Roma Italy, in two envelopes, the interior one being marked "SOLI", if sent by a Jesuit] shall be an Eligible Recipient.
- Reports may also be posted to 130 Power Street, Hawthorn, Vic, 3122 (marked to the attention of one of the Protected Disclosure Officers).

Anonymous Disclosures

- A disclosure can be made anonymously and still be protected under the Corporations Act. A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.
However, this may make it difficult to investigate the reported matter. Saint Ignatius' College (Adelaide) Ltd therefore encourages disclosers to provide their names.
- If a discloser wishes to disclose anonymously, the discloser should provide sufficient information to allow the matter to be properly investigated. Saint Ignatius' College (Adelaide) Ltd encourages the discloser to provide an anonymous email address through which additional questions can be asked and information provided. It will also allow Saint Ignatius' College (Adelaide) Ltd to report the progress of the investigation to the discloser, as appropriate.

External/Public Interest and Emergency Disclosures

- Disclosures may also qualify for protection if they are made to ASIC, APRA or a prescribed Commonwealth authority, or if an eligible whistleblower makes a disclosure to a legal practitioner to obtain advice about the operation of the whistleblower provisions.
- Eligible whistleblowers who make a 'public interest disclosure' or an 'emergency disclosure' also qualify for protection.

Public Interest Disclosures

An eligible whistleblower can disclose to a member of Parliament or a journalist only if the information has been previously disclosed to ASIC, APRA or a prescribed Commonwealth authority, and:

- at least 90 days has passed since the eligible whistleblower made the first disclosure to ASIC, APRA or a prescribed Commonwealth authority: and
- the eligible whistleblower does not have reasonable grounds to believe action is being, or has been, taken to address the information in the disclosure; and

- the eligible whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- before making the disclosure, the eligible whistleblower gives written notice to the original recipient that includes sufficient information to identify the previous disclosure and states that they intend to make a public interest disclosure; and
- the extent of information disclosed is no greater than necessary to inform the recipient of the disclosable matter.

Emergency Disclosure

An eligible whistleblower can disclose to a member of Parliament or a journalist only if the information has been previously disclosed to ASIC, APRA or a prescribed Commonwealth authority, and:

- the eligible whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- before making the disclosure, the eligible whistleblower gives written notice to the original recipient that includes sufficient information to identify the previous disclosure and states that they intend to make an emergency disclosure; and
- the disclosure of information is no greater than necessary to inform the recipient of the substantial and imminent danger.
- An eligible whistleblower may wish to consider obtaining independent legal advice before making a public interest or emergency disclosure.

INVESTIGATION OF A DISCLOSABLE MATTER

- For all matters reported an investigation will be undertaken as soon as practicable by either the College Principal or the Chair of the College Board and/or the Province Disclosures Panel. Whoever undertakes the investigation may with the whistleblower's consent, appoint a person or persons to assist in the investigation of the report. Where appropriate, the College Principal or the Chair of the College Board or the Province Disclosures Panel will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).
- On receipt of each disclosure, the College Principal, or the Chair of the College Board and/or the Province Disclosures Panel will determine whether the disclosure is eligible for protection and a formal, in-depth investigation is required.
- The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the rights of both the discloser and the person against whom the allegations are made and the nature of the disclosable matter and the circumstances.
- While the investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, the College Principal or the Chair of the College Board or one of the Province's Protected Disclosure Officers will contact the whistleblower to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation.
- Depending on the nature of the Reportable Conduct reported directly to Saint Ignatius' College (Adelaide) Ltd, the Province may undertake the investigation on behalf of Saint Ignatius' College (Adelaide) Ltd. The confidentiality of the discloser will be protected in accordance with the Confidentiality section of this policy.
- At the conclusion of an investigation, a report will be prepared and submitted to Saint Ignatius' College (Adelaide) Ltd Board. Where appropriate, the discloser will be provided with a final update that sets out the findings and outcomes arising from the investigation.

Fair treatment of employees mentioned in disclosures

Saint Ignatius' College (Adelaide) Ltd or the Province Disclosure Panel will take steps to ensure the fair treatment of employees who are mentioned in a disclosure that qualifies for protection:

- disclosures will be handled confidentially, when it is practical and appropriate in the circumstances;
 - when an investigation needs to be undertaken, the process will be objective and fair;
 - employees about whom disclosures are made will generally be given an opportunity to respond to the relevant allegations made in the qualifying disclosure.
- Saint Ignatius' College (Adelaide) Ltd, employee assistance program (EAP) services will be available to employees affected by the disclosure, should they require that support.
 - Saint Ignatius' College (Adelaide) Ltd or the Province Disclosure Panel will document the steps of the investigation and the findings from the investigation and report those findings to those responsible in the Province including Saint Ignatius' College (Adelaide) Ltd. The method for documenting and reporting the findings will depend on the nature of the disclosure. There may be circumstances where it may not be appropriate to provide details of the outcome to the discloser.

CONFIDENTIALITY

- Under the Corporations Act, the identity of the discloser of a qualifying disclosure and information that is likely to lead to the identification of the discloser must be kept confidential. A qualifying disclosure is a disclosure of information from an eligible whistleblower who has reasonable grounds to suspect that the information concerns:
 - misconduct
 - an improper state of affairs or circumstances
 - a breach of the law, or
 - danger to the public or the financial system
- Exceptions to this are disclosures to ASIC, the Australian Federal Police, a legal practitioner for the purpose of obtaining advice about the application of the whistleblower protections or made with the consent of the discloser.
- If a disclosure involves an issue which Saint Ignatius' College (Adelaide) Ltd is required to report, Saint Ignatius' College (Adelaide) Ltd may not be able to maintain the confidentiality of the identity of the disclosure. This disclosure could include State Police, the State Office of the Children's Guardian (or equivalent), State Education Standards Authority or the State Department of Education.
- It is also permissible to disclose information which could lead to the identification of the discloser if the disclosure is reasonably necessary for the purpose of investigating the matter, if all reasonable steps are taken to reduce the risk that the discloser will be identified as a result of the information being disclosed.
- Breach of these confidentiality protections regarding the discloser's identity and information likely to lead to the identification of the discloser is a criminal offence and may be the subject of criminal, civil and disciplinary proceedings. If you are subjected to a breach of confidentiality relating to a report made under this Policy, you should inform an Eligible Recipient, including an officer or senior manager within Saint Ignatius' College (Adelaide) Ltd immediately. You may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO.
- Confidentiality will be observed in relation to handling and storing records.

PROTECTIONS AVAILABLE

- Saint Ignatius' College (Adelaide) Ltd and the Province are committed to ensuring confidentiality with respect to all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer detriment.

Protection against detrimental conduct

- Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report; and
- If you are subjected to detrimental treatment because of making a report under this Policy, you should inform an Eligible Recipient, including an officer or senior manager within Saint Ignatius' College (Adelaide) Ltd immediately.
- Remedies for being subjected to detriment could include:
 - compensation;
 - injunctions and apologies;
 - reinstatement of a person whose employment is terminated; and/or
 - exemplary damages.

Protection from Civil, Criminal or Administrative Liability

- Eligible whistleblowers making a qualifying disclosure cannot be subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure. No contractual or other remedy or right may be enforced or exercised against the person on the basis of the disclosure.
- Whistleblowers who make some types of qualifying disclosures also provided immunities to ensure that information they disclose is not admissible in evidence against them in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.
- These immunities do not prevent an eligible whistleblower being subject to criminal, civil or other liability for conduct that is revealed by the whistleblower, only that the information the person has disclosed is not admissible in certain proceedings against them.

Protection of your identity and confidentiality

- Eligible whistleblowers making a qualifying disclosure are protected by the requirement that their identity, and information that may lead to their identification, must be kept confidential, subject to relevant exceptions as set out in Confidentiality Section above.
- Saint Ignatius' College (Adelaide) Ltd and the Province will protect an eligible whistleblower's identity by appropriately redacting documents and referring to the whistleblower in gender-neutral terms. It will also secure all documents and communicate them in a way that will maintain confidentiality.

Protection of files and records

- All files and records created from an investigation will be retained securely.
- Unauthorised release of information to someone not involved in the investigation without your consent as the person making a disclosure will be a breach of this Policy.
- Those making a disclosure are assured that a release of information in breach of this Policy will be regarded as a serious matter and will be dealt with under disciplinary procedures.
- Saint Ignatius' College (Adelaide) Ltd and the Province seek to provide appropriate protections to disclosers, noting the following national legislative protections:

- The *Taxation Administration Act 1953 (Cth)* (**Taxation Administration Act**) also gives special protection to disclosures about breaches of any Australian tax law, provided certain conditions are met – refer to Attachment A for details.

DEFINITIONS

Name	Description
Code of Conduct	The Province-approved document which sets out what personal and professional standards mean for the Province, the Province’s primary obligations and the associated behaviour that are expected of all Jesuits, Partners in Mission and Contractors, and how to report inappropriate behaviour. See: https://jesuit.org.au/wp-content/uploads/Code-of-Conduct.pdf
Contractor	Means a person who is not an employee but is engaged under an independent service contract to complete a specific job or project within a specified time frame for an agreed price. The Code of Conduct applies to Contractors who are permitted to be unsupervised while on ministry grounds e.g. engaged using a tender process and formal induction.
Disclosure	Notification of an allegation of wrongdoing e.g. breach of the Code of Conduct, corrupt conduct, fraud, maladministration or serious and substantial waste.
Eligible recipient	Means the following: (a) an officer or senior manager of Saint Ignatius’ College (Adelaide) Ltd or a related body corporate; (b) an auditor, or a member of an audit team conducting an audit, of Saint Ignatius’ College (Adelaide) Ltd or a related body corporate; (c) an actuary of Saint Ignatius’ College (Adelaide) Ltd or a related body corporate; (d) a person authorised by Saint Ignatius’ College (Adelaide) Ltd to receive disclosures that may qualify for protection under Part 9.4AAA of the <i>Corporations Act 2001(Cth)</i> or Part IVD of the <i>Income Tax Assessment Act 1953 (Cth)</i> , including a member of the Province Protected Disclosures Panel and any person named in clause 4 of these Procedures.
Jesuit	Means any Priest or Brother member of the Society of Jesus or someone in formation for those roles (e.g. a novice or a scholastic).

Partners in Mission	Means a lay person involved in Saint Ignatius' College (Adelaide) Ltd
Provincial	The member of the Society of Jesus from time to time holding the office of Major Superior of the Province or, in the case of absence or indisposition, the acting Provincial or, in the event of the office of the Provincial being vacant at any time, the member of the Society of Jesus for the time being performing the duties of Provincial.
Reportable Conduct – Corporations Act	A disclosure under the Corporations Act can be made by a whistleblower who has reasonable grounds to suspect that the information concerns 'misconduct' or an 'improper state of affairs or circumstances' in relation to the Company (or a related body corporate) (Reportable Conduct)
Qualifying Disclosure	A qualifying disclosure is a disclosure of information from an eligible whistleblower who has reasonable grounds to suspect that the information concerns: misconduct, an improper state of affairs or circumstances, a breach of the law, or, danger to the public or the financial system
Volunteer	Means a person who is involved with Saint Ignatius' College (Adelaide) Ltd, generally without payment or financial reward. The Code of Conduct applies equally to volunteers as it does to Jesuits and Partners in Mission.

POLICY REVIEW

- This Policy will be monitored for compliance and effectiveness by Saint Ignatius' College (Adelaide) Ltd, in consultation with the Province's Director of Professional Standards. This Policy will be reviewed after 12 months from approval and at least every two years thereafter.

ATTACHMENT A - SPECIAL PROTECTIONS UNDER THE TAXATION ADMINISTRATION ACT

The Taxation Administration Act gives special protection to disclosures about a breach of any Australian tax law by Saint Ignatius' College (Adelaide) Ltd, or misconduct in relation to the tax affairs of Saint Ignatius' College (Adelaide) Ltd if the following conditions are satisfied:

- 1) the discloser is or has been:
 - a) an officer or employee of Saint Ignatius' College (Adelaide) Ltd;
 - b) an individual who supplies goods or services to Saint Ignatius' College (Adelaide) Ltd (whether paid or unpaid) or an employee of a person who supplies goods or services (whether paid or unpaid) to Saint Ignatius' College (Adelaide) Ltd, including employees of the Society of Jesus in Australia;
 - c) an individual who is an associate of Saint Ignatius' College (Adelaide) Ltd;
 - d) a spouse, child, dependent or dependent of the spouse of any individual referred to at (a) to (c) above;
- 2) the report is made to:
 - a) a Protected Disclosure Officer;
 - b) a director, secretary or senior manager of Saint Ignatius' College (Adelaide) Ltd or a related body corporate;
 - c) any external auditors (or a member of that audit team) engaged by Saint Ignatius' College (Adelaide) Ltd;
 - d) a registered tax agent or BAS agent who provides tax or BAS services to Saint Ignatius' College (Adelaide) Ltd;
 - e) any other employee or officer of Saint Ignatius' College (Adelaide) Ltd who has functions or duties relating to tax affairs of (e.g. an internal accountant);
 - f) the Commissioner of Taxation; or
 - g) a lawyer for the purpose of obtaining legal advice or representation in relation to a report; and
- 3) if the report is made to an Eligible recipient, the discloser:
 - a) has reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Saint Ignatius' College (Adelaide) Ltd or an associate of; and
 - b) considers that the information may assist the Eligible recipient to perform functions or duties in relation to the tax affairs of Saint Ignatius' College (Adelaide) Ltd or an associate of; and
- 4) if the report is made to the Commissioner of Taxation, the discloser considers that the information may assist the Eligible recipient to perform functions or duties in relation to the tax affairs of Saint Ignatius' College (Adelaide) Ltd or an associate of .

The protections given by the Taxation Administration Act when these conditions are met are:

- 1) the discloser is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- 2) no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the discloser for making the report;
- 3) where the disclosure was made to the Commissioner of Taxation, the reported information is not admissible against the discloser in criminal proceedings or in proceedings for the imposition of a penalty, except where the proceedings are concerned with whether the information is false;
- 4) unless the discloser has acted unreasonably, a discloser cannot be ordered to pay costs in any legal proceedings in relation to a report;
- 5) anyone who causes or threatens to cause detriment to a discloser 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 liable to pay damages;
- 6) a discloser's identity cannot be disclosed to a Court or tribunal except where considered necessary;

- 7) the person receiving the report commits an offence if they disclose the substance of the report or the discloser's identity, without the discloser's consent, to anyone except the Commissioner of Taxation, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

CONFIDENTIALITY

If a report is made, the identity of the discloser will be kept confidential unless one of the following exceptions applies:

- 1) the discloser consents to the disclosure of their identity;
- 2) disclosure of details that might reveal their identity is reasonably necessary for the effective investigation of the allegations;
- 3) the concern is reported to the Commissioner of Taxation or the AFP; or
- 4) the concern is raised with a lawyer for the purpose obtaining legal advice or representation.

REVISION RECORD

Document Title	Whistleblower Policy
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