

Whistleblowing Policy and Procedures

SECTION	Human Resources
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Executive Summary

The Anglican Schools Commission (Inc.), trading as AngliSchools ("AngliSchools"), seek to enable students, parents, staff members or other persons involved with AngliSchools to report serious concerns about improper conduct or practices confidentially and anonymously, to the extent possible under existing laws, and ensuring that they are not victimised or subjected to any form of detrimental action.

Key Actions

- Communicate Policy and Procedures to School Council and Staff.
- Develop school-specific addendums to this document which provide school-specific support.
- Ensure the Policy is made available to the school community.
- Develop a Whistleblower Register.
- Maintain confidential records of reports received.
- Adhere to the Whistleblowing Reporting and Investigating flowchart.

NB: The list above is not exhaustive, and the policy should be read in full to understand all obligations.

1. Purpose

- 1.1. The purpose of this policy is to enable students, parents, staff members, including Board or School Council members or other persons involved with AngliSchools to report serious concerns about improper conduct or practices confidentially and anonymously, to the extent possible under existing laws, and ensuring that they are not victimised or subjected to any form of detrimental action.
- 1.2. The intent is to ensure that AngliSchools operate ethically and with integrity.

2. Scope

- 1.3. This policy applies to AngliSchools.

3. Definitions

- 3.1 **Eligible Recipient** is an individual to who can receive a disclosure.

- 3.2 **Eligible whistleblower** could be:

- A Board or School Council member;
- A Head Office/school employee;
- A person, or employee of a person, who supplies goods or services (paid or unpaid) to AngliSchools ;
- An individual who is an associate of AngliSchools;
- A relative or dependent (or dependents of a spouse) of any individual above;
- Parents who volunteer or have volunteered for such things as camps, canteen or sport activities; and
- The relatives and dependents of the volunteer and of the volunteer's spouse.

- 3.3 **Discloser** is an individual who discloses wrongdoing or an eligible whistleblower.

- 3.4 **Reasonable grounds** mean that the discloser has the suspicion that could reasonably be formed based on the facts and information available to them. The recipient is not required to believe the suspicion. All disclosures must be accepted.

- 3.5 **Reportable Conduct** might include:

- Fraudulent activity;
- Theft;
- Dealing in illicit drugs;
- Offering or taking a bribe;
- Negligence;
- Unsafe work practices;
- Breach of trust;
- Causing or threatening detriment to a discloser;
- Breach of a regulatory requirement;
- Breach of duty.

- 3.6 **Whistleblowing** is the means by which past and present staff, students, parents, volunteers, including Board and School Council members or other parties can safely report serious actual, suspected or anticipated improper conduct or practices within AngliSchools, such as dishonest, fraudulent, corrupt or illegal activities.
- 3.7 **Whistleblower** is defined as a person who discloses a serious concern about actual, suspected or anticipated improper conduct or practices within AngliSchools, such as dishonest, fraudulent, corrupt or illegal activities.

4. Principles

- 4.1. A student, parent, staff member, including Board and School Council members or other person involved with AngliSchools should report concerns about improper conduct which is potentially illegal, corrupt, dishonest, unethical, unsafe work practices, illegal acts including theft, drug sale or use, violence or threatened violence, criminal damage against property, breaches of relevant laws, regulations or by-laws or any other conduct which may cause loss to AngliSchools or its schools or be otherwise detrimental to AngliSchools .
- 4.2. A student, parent, staff member, including Board and School Council members or other person shall be free to report, without fear of retaliation, activity occurring in AngliSchools that the reporting person believes in good faith to be improper.
- 4.3. AngliSchools will do its utmost to protect the identity of the student, parent, staff member or other person who raises a concern in accordance with this policy.
- 4.4. This policy is not intended to replace the Dispute Resolution Procedures documented in the AngliSchools Enterprise Agreements or relevant Award or contract of employment, which is there for all staff to raise any matter they may have in relation to their work or their work environment, other person, or decision affecting their employment.
- 4.5. This policy is not intended to replace the AngliSchools Child Protection Policies. A matter which would result in a mandatory report must be reported in accordance with the mandatory reporting policy.
- 4.6. Students, parents, staff members, including Board and School Council members or other persons involved with AngliSchools must be made aware of the AngliSchools Whistleblowing Policy and Procedures and when, how and who to tell if they have concerns. This Policy must be made available on the school website.

5. Procedures

- 5.1. AngliSchools are required to maintain a comprehensive record of the matter reported. These will include any statements made.
- 5.2. Refer to **Appendix 1** for steps to be taken when reporting and/or investigating a disclosure.

Reporting

- 5.3. A student, parent, staff member, including Board and School Council members or other person of AngliSchools or its schools who wishes to make a report in connection with reportable conduct should contact the Principal verbally or in writing or AngliSchools Chief Executive Officer (CEO) verbally or in writing using the following email ceonotification@anglischools.edu.au.
- 5.4. Where the matter involves:
- the CEO, the matter shall be referred in writing directly to the Chair of the Board.

- ii. a Principal, the matter shall be referred in writing directly to the Chair of the School Council, as appropriate. The CEO must also be advised in writing.
- 5.5. All reports will be kept confidential and secure. All persons making a report are assured that in making a report they will not be personally disadvantaged by dismissal, demotion, any form of harassment or discrimination. The person making the report will be kept informed of the progress of the investigation as far as is allowed by the law.
- 5.6. If a whistleblowing report is made, the Principal shall inform the CEO and Chair of the School Council.

Investigation Procedures

- 5.7. All reports of reportable conduct will be subject to thorough investigation by the CEO or Principal, as appropriate.
- 5.8. The CEO or Principal will provide support to the person who has made the report and to the person to whom the report relates while the matter is investigated.
- 5.9. The CEO or Principal will follow best practices and will be fair and independent of the person who made the report and the person who is the subject of the reportable conduct.
- 5.10. The investigation will include the following steps:
 - Full details of the allegations obtained;
 - Person against whom allegations are made is informed;
 - Involvement of external parties such as the Police considered by the CEO, Chair of the Board, Principal or Chair of the School Council as appropriate;
 - Allegations fully investigated; and
 - The CEO, Chair of the Board, Principal or Chair of the School Council decide on action to be taken, as appropriate.
- 5.11. Where the CEO, Chair of the Board, Principal or Chair of the School Council determine that the allegations are of a very serious nature, external investigators will be engaged.
- 5.12. In the case of a serious matter, there may be additional obligations to report under legislative requirements.
- 5.13. The identity or any information that could lead to the identity of the person who has made a report will not be released to any person who is not involved in the investigation/resolution of the matter.

Abuse of the reporting process

- 5.14. All reports must be made in good faith. Abuse of this confidential reporting process will not be tolerated and will be treated as a serious breach of the AngliSchools Code of Conduct.

Timescale

- 5.15. The CEO or Principal will provide a written response to the person making the report within 5 working days, acknowledging receipt of the report. Further updates will be provided in a timely manner, where appropriate.
- 5.16. Following the decision by the CEO or Principal on the action to be taken in relation to the concern raised, the person making the report will be notified in writing of the decision within 5 working days.

Monitoring

- 5.17. AngliSchools will monitor and review this policy to assess its effectiveness in encouraging the reporting of reportable conduct, protection of persons making the reports, and investigation of reports.

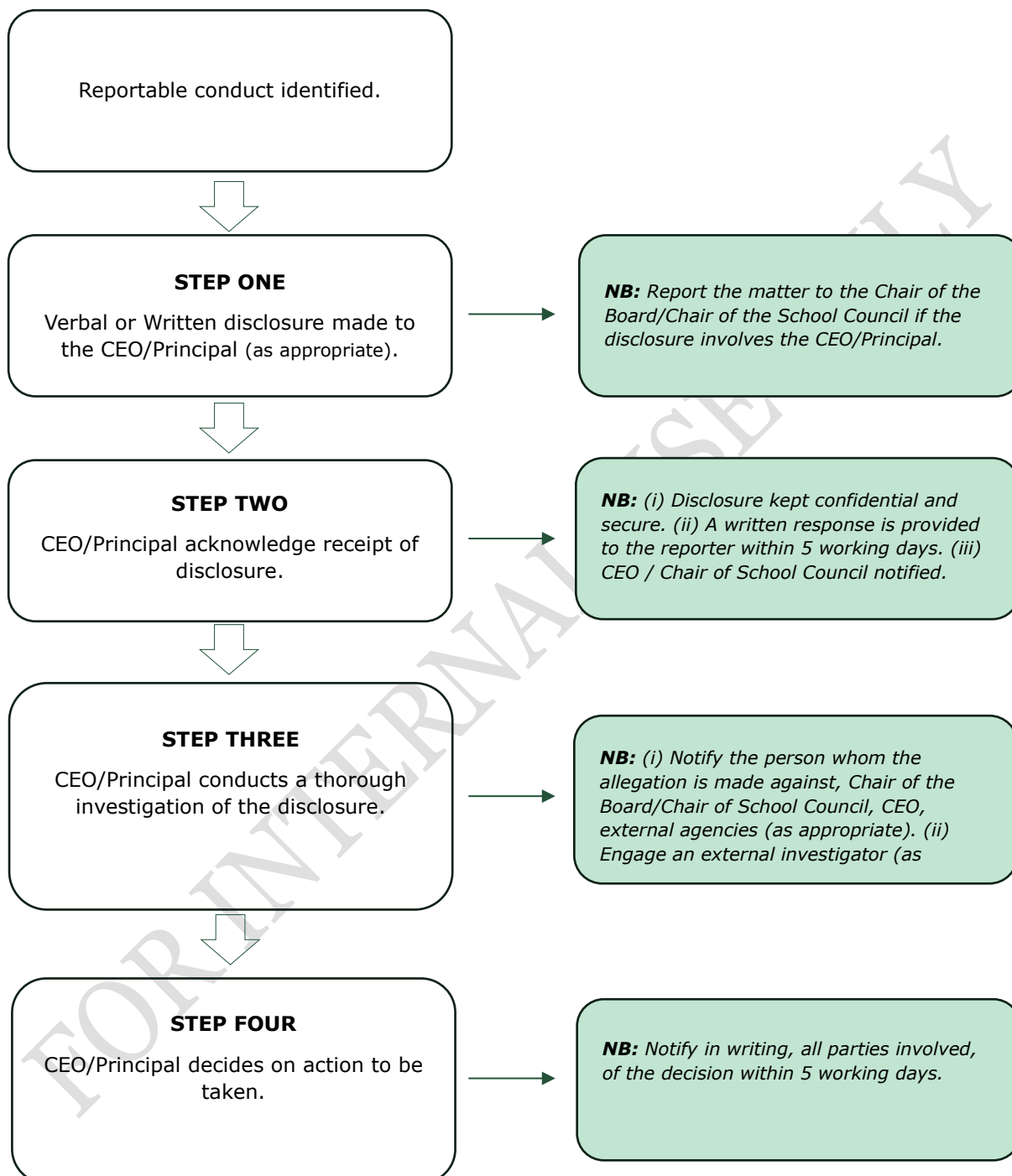
6. School-specific Process

- 6.1. Schools may add school-specific information to supplement this policy and procedures document.

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Appendix 1

STEPS FOR REPORTING AND INVESTIGATING



Version Control

Version	Date	Summary of Changes
1	Oct 18	New Policy.
2	Dec 20	Expand on definitions. Include a reporting and investigating flowchart.
3	Aug 23	Annual review.