



POLICY STATEMENT WHISTLEBLOWER POLICY

1.0 Introduction

At Hillbrook, we strive to maintain a positive working environment of trust and respect where all voices can be heard. Fundamental to this is our commitment to protecting the rights of anyone who reports wrongdoing in good faith.

We will not tolerate retaliatory action or threats against any person or related persons or entities who have made, or who is believed to have made, a report of wrongdoing. For example, the person who has made the report must not be disadvantaged or victimised by:

- dismissal
- demotion
- any form of harassment
- discrimination

This policy has been developed in accordance with the Public Interest Disclosure Act 2010. It does not apply if the report of wrongdoing is proven to be vexatious or malicious.

2.0 Definition of 'whistleblowing' for this policy

Whistleblowing is defined as: "the deliberate, voluntary disclosure of an actual, suspected or anticipated wrongdoing by an organisation or individual within that organisation".

3.0 Definition of 'wrongdoing' for this policy

Wrongdoing covered by the policy includes any conduct that:

- Is dishonest, fraudulent or corrupt;
- Is illegal, such as theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of state or federal legislation;
- Is unethical, such as dishonestly altering company records or engaging in questionable accounting practices or wilfully breaching Hillbrook's Rights and Responsibilities;
- Is potentially damaging to Hillbrook, such as unsafe work practices or substantial wasting of resources;
- May cause financial loss to the School or damage Hillbrook's reputation or interests; or
- Involves any other kind of serious impropriety.



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4.0 Scope/people affected

This policy applies to employees, volunteers, contractors and clients of Hillbrook Anglican School in relation to reports concerning wrongdoing.

It is not intended to replace other reporting structures, except in situations where existing reporting systems have failed to process the issue or it was processed in an inappropriate, unfair or biased manner. These other reporting structures include those for dispute resolution, grievances, equal opportunity, discrimination, harassment, or bullying.

5.0 How may wrongdoing be reported?

Any employee, volunteer, contractor or client who detects, or has reasonable grounds for suspecting wrongdoing, is encouraged to raise any concerns with their immediate supervisor through normal reporting channels.

The supervisor must report the allegation to the appropriate School Leadership Team member, who is then responsible for ensuring that the matter is properly dealt with.

If allegations are made against an SLT member/Principal then a Director (usually the Chair of the Board) should be informed and take the issue forward. Action may include appointing a person independent of the area of operations to inquire into the allegations.

6.0 Confidentiality of whistleblower's identity and whistleblowing reports

If a person makes a report of alleged or suspected wrongdoing under this policy, Hillbrook Anglican School will endeavour to protect that person's identity from disclosure. This may not occur if confidentiality is not a practical option.

Generally, Hillbrook will not disclose the person's identity unless:

- The employee making the report consents to the disclosure;
- The disclosure is required or authorised by law; and/or
- The disclosure is necessary to further the investigation.

Generally, reports made under this policy will be treated confidentially. However, when a report is investigated it may be necessary to reveal its substance to people such as other Hillbrook school personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies.

At some point in time, it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report.

Hillbrook Anglican School will also take reasonable precautions to store any records relating to a report of wrongdoing securely and to permit access by authorised persons only. Unauthorised disclosure of information relating to a report, the identity of a Hillbrook employee, volunteer, contractor or client who has made a report of



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wrongdoing or information from which the identity of the reporting person could be inferred, will be regarded seriously and may result in disciplinary action, which may include dismissal.

7.0 The Principal

The Principal will ensure adequate information is made available for the effective operation of this policy. The Principal will ensure that the staff of the School and those involved in volunteer positions will be made aware of the existence and operations of this policy from time to time.

8.0 The School Board

The SLT will report to Hillbrook's School Board any significant activity that has come to their attention as a consequence of this policy. The School Board will review this policy as required.

9.0 Links to the *Grievance and Dispute Resolution Policy*

This policy is concerned with disclosure of information in the public interest. The process under this policy must not be used for trivial or vexatious matters. Further, this policy is not intended to replace the grievance and dispute resolution procedure, 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.