



POLICY

NAME: Whistleblower Protection Policy and Procedure
November 2022

UPDATE DUE: November 2024, or more often as circumstances require

Commitment to child safety

Camberwell Girls Grammar School (CGGS) is a child safe organisation which welcomes all children, young people, their families, and their participation. We are committed to providing culturally inclusive environments where all our students are safe and feel safe and have confidence their voice is heard. We promote positive interactions between students and adults, and between students and their peers based on mutual trust and respect.

Child safety is a shared responsibility. Everyone engaged or employed by CGGS has a role to play in promoting child safety. All are aware of their responsibility to promptly raise issues or concerns about a child's safety or wellbeing. We have zero tolerance for child abuse, and we take proactive steps to identify children who may be at risk or experiencing vulnerability to mitigate harm or distress.

Particular attention is given to the safety needs of Aboriginal or Torres Strait Islander students, those from culturally and linguistically diverse backgrounds, students with disabilities, international students, those unable to live at home and children and young people who identify as LGBTQIA+.

We regularly seek input from students, parents, carers, staff, and volunteers in our child safe practices and communicate our policies and ongoing strategies following each systematic review.

Purpose

Whistleblower Protection is a mechanism which members of the Camberwell Girl's Grammar School (CGGS) community may confidentially raise serious concerns about conduct they suspect may be illegal, fraudulent, corrupt, damaging, or improper, without fear of reprisal, dismissal, or discriminatory treatment.

This policy aims to:

- Encourage the reporting of actual or suspected wrongdoing that cannot be appropriately reported through normal business channels
- Describe the process for making a whistleblower disclosure and the types of matters that should be reported
- Provide a framework for receiving, handling, and investigating disclosures on a timely basis.

Scope

This policy applies to 'Eligible Whistleblowers' as defined within the Corporations Act 2001 (sec 1317AAA).

An Eligible Whistleblower is a current or former:

- Director / officer
- Employee
- Supplier of goods or services (whether paid / unpaid) - includes school volunteers
- Relative of any of the above individuals
- Dependent(s) of any of the above individuals or of such an individual's spouse

Disclosures that are not from an 'Eligible Whistleblower' do not qualify for protection under the Corporations Act 2001 ('the Act').

Students and parents are not recognised as Eligible Whistleblowers under the Act and are therefore not afforded the same level of protection under the law unless they fall within the above eligibility criteria (such as a parent volunteer to the School). However, the school recognises the importance of these individuals and takes all reasonable steps to provide these individuals with the highest possible level of protection while treating all matters raised seriously and investigating them appropriately. Unlike a complaint where an individual expresses a personal dissatisfaction or mistreatment, the person blowing the whistle is usually not directly or personally affected by the matter of concern. They are raising the concern as they believe it has far-reaching implications on the wider school community.

For the School's complaints handling protocol and procedures refer to the Complaints Management Policy on the School's website.

Policy Statement

CGGS is committed to a culture of good corporate governance and compliance and maintaining a high standard of integrity to promote school community confidence. The school upholds this commitment through its whistleblowing program by providing a mechanism to support the reporting of serious misconduct, corruption, danger and illegal practices within the school.

The school recognises that people who have a work, service or client relationship with the school are often the first to realise there may be something seriously wrong. However, they may choose not to speak up due to fear of victimisation. The purpose of this policy is to set the framework to provide the protection for these individuals (both past and present) to come forward and report wrongdoing confidentially and anonymously.

Guiding Principles

The school's whistleblowing policies and procedures are built upon the following guiding principles:

- All 'Eligible Whistleblowers' (refer to definitions section) are encouraged to voice or act on any concerns of serious misconduct
- Information about how and where to 'whistleblow' as well as how a disclosure will be handled is clearly documented and publicly available on the school's website
- The school acknowledges, investigates, and responds to disclosures within an appropriate and timely manner
- There is no cost to the whistleblower to access the Whistleblower Protection Program
- Whistleblowers will not be victimised or discriminated against
- The School ensures fair treatment of all individuals mentioned in a disclosure that qualifies for protection
- The Whistleblower Protection Program is objective and confidential
- The Whistleblower Protection Program is regularly reviewed for improvement

Roles and Responsibilities

The **School Council** is responsible for:

- Governing the Whistleblower Protection process, including monitoring the number nature and outcome of disclosures
- Ensuring that an appropriate framework is in place to protect and support whistleblowers within the school.

The **Principal** is responsible for:

- The overall accountability and effectiveness of the process to manage disclosures within the school
- Authorising the Whistleblower Protection Officers (WPO) to receive disclosures.

The **Eligible Recipients (Whistleblower Protection Officers)** are responsible for:

- Safeguarding the wellbeing and interests of the whistleblower at all times
- Receiving reports of alleged Disclosable Conduct and co-ordinating any necessary response or action
- Keeping the Discloser informed about progress
- Ensuring their independence is maintained at all times, ensuring confidentiality and the integrity of the reporting process and
- Appointing the Whistleblower Investigation Officer (WIO).

The **Whistleblower Investigation Officer** is responsible for:

- Investigating the disclosure and reporting back to the WPO
- Providing timely updates to the Discloser during the key stages of the investigation and allow all parties the opportunity to respond
- Ensuring that all reports and supporting documents are kept confidential and secure and that the protection, safety and wellbeing of the Discloser is maintained at all times
- Maintaining their independence at all times.

Definitions

Discloser	Person who discloses wrongdoing or an 'Eligible Whistleblower'.
Disclosable Matter	<p>Disclosure information that concerns:</p> <ul style="list-style-type: none"> • Misconduct (fraud, negligence, default, breach of trust and breach of duty); • An 'improper state of affairs or circumstances' • Illegal activity • Conduct that represents danger to the public or financial system <p>Excludes: personal work related grievances of the whistleblower that is not about victimisation for whistleblowing.</p>
Designated Commonwealth Authority	<ul style="list-style-type: none"> • ASIC • APRA • ATO • Other Commonwealth authority
Eligible Recipient	<ul style="list-style-type: none"> • School Council member • Officer (including director or company secretary) • Senior manager • Auditor or member of an audit team conducting an audit • A person authorised by the school to receive disclosures
Eligible Whistleblower	<p>A current or former:</p> <ul style="list-style-type: none"> • director / officer • employee • supplier of goods or services (whether paid / unpaid) - includes school volunteers • relative of any of the above individuals • dependent(s) of any of the above individuals or of such an individual's spouse <p>Excludes: Students and parents/carers</p>
Reasonable Grounds	Reasonable ground is an objective test and relates to whether a reasonable person in possession of the information would form the belief that conduct of a disclosable nature has occurred.
Regulated entity	All companies registered under the Corporations Act
Whistleblowing	The disclosure of actual or suspected wrongdoing in the school that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice, or any other serious wrongdoing.

Legal Context

A 'whistleblower' is a person within the school who makes a disclosure, whether anonymously or not, with respect to serious misconduct or illegal activity that has occurred within the school. It may also be in relation to information on tax avoidance behaviour and other tax related issues (refer to Tax Whistleblower section for further details).

In order to be eligible for protections under the Corporations Act ('Act'), the disclosure must be:

- In relation to a **regulated entity** (companies registered under the Corporations Act); and
- Made by an **Eligible Whistleblower**; and
- Of a **Disclosable Matter**; and
- Made to an **eligible recipient** or a **Designated Commonwealth Authority**

The whistleblower must have 'reasonable grounds to suspect' wrongdoing.

Disclosable Matters

This policy covers information of 'Disclosable Matters' where the Discloser has reasonable grounds to suspect concerns of misconduct, or an improper state of affairs or circumstances, which may include the following wrongdoings as reference:

- Fraud, money laundering or misappropriation of funds
- Illegal conduct such as theft, dealing in or use of illicit drugs and other criminal activities
- Negligence
- Default
- Breach of trust
- Breach of duty
- Offering or accepting a bribe
- Financial irregularities
- Failure to comply / breach of legal or regulatory requirements (including unreported child safety concerns)
- Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure.

Disclosable Matters may also include conduct that does not involve a contravention of a particular law. Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a Disclosable Matter, even if it does not involve a breach of a particular law.

A Discloser may still qualify for protection even if their disclosure turns out to be incorrect.

Disclosures that are not about 'Disclosable Matters' do not qualify for protection under the Corporations Act (or the Taxation Administration Act, where relevant).

Personal work related grievances

Disclosures that relate solely to personal work-related grievances, and that do not relate to victimisation, detriment, or threat of detriment to the Discloser, does not qualify for protection under the Corporations Act. Examples of personal work-related grievances that do not qualify may include (but is not limited to the following):

- An interpersonal conflict between the Discloser and another employee;
- A decision that does not involve a breach of workplace laws;
- A decision about the engagement, transfer, or promotion of the Discloser;
- A decision about the terms and conditions of engagement of the Discloser; or
- A decision to suspend or terminate the engagement of the Discloser, or otherwise to discipline the Discloser.

For personal work-related grievances, refer to the School's Complaints Management Policy on the School's website.

A **personal work-related grievance** may still qualify for protection if:

- It includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- The School has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the Discloser's personal circumstances;
- The Discloser suffers from or is threatened with detriment for making a disclosure;
- The Discloser seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

Interrelated Policies

There may be a disclosure where it relates to other CGGS policies or have other legal obligations which apply such as the Reportable Conduct Scheme. CGGS will then have obligations under this policy and the Reportable Conduct Scheme and may adapt procedures to ensure compliance with those obligations and to reduce any repetition.

Whistleblower Protections

Tax Whistleblowers

Eligible Whistleblowers may disclose information to the ATO on tax avoidance behaviour and other breaches of the tax law and be provided with the same level of protection that is consistent with the Corporations Act.

Public Interest Disclosure

The disclosure of information to a journalist or a parliamentarian, where the Discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. To qualify for protection under public interest disclosure, the following conditions must be met:

1. At least 90 days have passed since the Discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;

2. The Discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
3. The Discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
4. Before making the public interest disclosure, the Discloser has given written notice to the body to which the previous disclosure was made that:
 - i. Includes sufficient information to identify the previous disclosure; and
 - ii. States that the Discloser intends to make a public interest disclosure.

A Discloser should seek independent legal advice before making a public interest disclosure.

Emergency Disclosure

The disclosure of information to a journalist or parliamentarian, where the Discloser 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. To qualify for protection under emergency disclosure, the following conditions must be met:

1. The Discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
2. The Discloser 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;
3. Before making the emergency disclosure, the Discloser has given written notice to the body to which the previous disclosure was made) that:
 - i. Includes sufficient information to identify the previous disclosure; and
 - ii. States that the Discloser intends to make an emergency disclosure; and
4. The extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

A Discloser should seek independent legal advice before making an emergency disclosure.

Disclosures to a Legal Practitioner

Any disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'Disclosable Matter').

Additional information about whistleblowing and protection may be obtained by contacting the School's Whistleblower Protection Officer.

Eligible Recipient

The following person(s) are authorised by the School as 'eligible recipients' to receive disclosures that qualify for protection:

- Whistleblower Protection Officers (refer to nominated list below)
- Auditor or member of an audit team conducting an audit
- Legal practitioners
- Regulatory bodies (including ASIC, APRA or another Commonwealth body prescribed by regulation)
- ATO (for tax related disclosures)
- Journalist or parliamentarian (for public interest disclosures)
- Journalist or parliamentarian (for emergency disclosures)

For public interest disclosures and emergency disclosures, the Discloser must be mindful of the additional requirements to qualify for protection.

Any disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'Disclosable Matter').

Additional information about whistleblowing and protection may be obtained by contacting the School's Whistleblower Protection Officer or through an independent legal adviser.

A Discloser must make a disclosure directly to one of the School's eligible recipients to qualify for protection as a whistleblower under the Corporations Act.

Making a Disclosure

In the first instance, prior to action under this policy, the Discloser is encouraged to follow normal reporting channels and discussing the matter with their immediate manager. If the nature of the matter or the parties involved are deemed to be inappropriate to report to their immediate manager, or if the Discloser has reasonable concerns about doing so, the Discloser should contact the WPO in person, via phone or in writing (refer to contact details below). Alternatively, the Discloser may opt to bypass the School's internal reporting channels and disclose directly to an external or regulatory body in the first instance and still qualify for protection under the Corporations Act.

Acting in Good Faith

A person making a whistleblower disclosure is expected to act in good faith and have reasonable grounds for believing that wrongdoing has occurred. A person should not disclose matters that they know to be false. In doing so they may be in breach of this Policy and may be subject to disciplinary action.

Internal disclosure options

CGGS encourages Disclosers to consider making an internal report in the first instance so that the School can address any wrongdoing as early as possible. Refer to Appendix A for an outline of the process.

A Disclosure can be made to an Eligible Recipient in relation to the School using the Whistleblower Disclosure Form in Appendix B of this document and sending it to one of the School's authorised representatives below who is an 'eligible recipient' to receive disclosures, in order to qualify for protection.

The School's Whistleblower Protection Officers (WPOs):

Name	School Position	Contact no.	Email
Debbie Dunwoody	Principal	9813 1166	principal@cggs.vic.edu.au
Stephen Cuddon	Chief Financial & Operating Officer	9813 1166	financeops@cggs.vic.edu.au
Davina McClure	Deputy Principal	9813 1166	mclured@cggs.vic.edu.au
Paul Donohue	Head of Junior School	9813 1965	donohuep@cggs.vic.edu.au

External disclosure options

A Discloser may decide to disclose directly with an external regulatory body. Fact sheets are available on the regulators' websites.

External / Regulatory Body	Link
ASIC	https://www.asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/
APRA	https://www.apra.gov.au/become-a-whistleblower-and-make-a-public-interest-disclosure
ATO	https://www.ato.gov.au/General/Gen/Whistleblowers/

Anonymous Disclosure

Disclosures can be made anonymously and still be protected under the Corporations Act. factually accurate, complete, based on first-hand knowledge and without material omission. It should be as detailed as practicable and include (but not be limited to):

- The exact nature of the alleged Disclosable Matter
- When the alleged Disclosable Matter took place
- Where the alleged Disclosable Matter took place
- Parties involved
- The names of witnesses who may know information that is relevant to the investigation

Refer to Appendix B for the Whistleblower Disclosure Form.

Handling and Investigating a Disclosure

Receipt of a Disclosure

The School will provide written correspondence to the discloser (provided contact details are available) acknowledging receipt of the Whistleblower Disclosure Form as a matter of priority and will assess whether it applies for protection and whether a formal investigation is required.

Fair Treatment

All employees who are mentioned in a disclosure that qualifies for protection, including those who are the subject of a disclosure, have the right to fair treatment. The School, where reasonably practicable to do so, will ensure fair treatment of individuals mentioned in a disclosure by:

- Handling disclosures confidentially
- Assessing and investigating all disclosures reported in the Whistleblower Disclosure Form
- Substantiating or refuting the matters reported in the Whistleblower Disclosure Form
- Focusing on the substance and facts of the disclosures rather than the motive of the Discloser
- Investigating matters objectively and independently
- Providing counselling services to all employees who are the subject of a disclosure, including the Discloser
- Advising employees who are the subject of a disclosure, the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken.

Investigation Process

An Investigator will be assigned on a case-by-case basis depending on the particular circumstances of the disclosure. Where the Whistleblower Protection Officer decides that the allegations are of a very serious nature or involve members of the School where a conflict of interest may arise, external investigators may be engaged, whose role is to obtain factual evidence that either substantiates or refutes the claims made by the Discloser on the Whistleblower Discloser Form.

The WIO must maintain their independence at all times, provide timely updates to the Discloser during the key stages of the investigation and allow all parties the opportunity to respond. The frequency and timeframe of the updates may vary depending on the nature of the disclosure.

The effectiveness of the investigation is dependent on the quality of information provided by the Discloser. Therefore, anonymity may hamper the investigation process and impact on the ability of the School to provide the protection afforded to the Discloser.

In certain instances, where there is a potential risk to the parties involved or a risk to the reputation of the School, the person alleged to have engaged in misconduct may be stood down from duty pending investigation. Where a person is stood down while the investigation takes place, no inference of wrongdoing or assumed guilt will apply.

As soon as practicable, after the investigation is concluded, the WIO will prepare a report providing a summary of the facts of the suspected misconduct and of the findings of the investigation (i.e. whether the misconduct was substantiated or unsubstantiated). There may be circumstances where it may not be appropriate to provide full details of the outcome to the Discloser. The report shall be provided to the WPO who shall in consultation with the Principal, ensure that appropriate measures are taken in light of the findings in the report, which may include notification to regulatory and/or enforcement agencies.

Confidential record keeping and documentation for each step in the investigation process will be maintained.

Determination / Outcome

The WIO will provide a written report to the nominated WPO and Principal detailing all the evidence and a finding as to whether the disclosable matter is substantiated or not.

The Principal will make a determination on the report, following which both parties will be provided with the Principal's conclusion in writing.

If the determination substantiates the disclosable matter, the Principal may decide outcomes that may include:

- Counselling;
- Support for the parties involved, as deemed appropriate;
- Staff professional learning and development;
- Warning – oral/written;
- Suspension; and
- Dismissal/Expulsion.

If the decision concludes that the disclosable matter is not substantiated, all parties will be advised accordingly. Each party has the right to appeal and request an independent arbiter to review the decision.

Appeal

If an appeal is lodged, the Principal will outsource to an independent arbiter to examine all of the evidence and advise accordingly. The independent arbiter's review will be final with CGGS.

If the Principal believes that there is a risk of litigation, the school's insurers and Chair of School Council will be notified.

Supportive Environment and Practical Protection for Disclosers

The School is committed to providing a supportive environment for any person making a whistleblower disclosure.

In particular, a whistleblower can expect:

- Any request for anonymity is respected and if their identity is revealed it will, as far as possible, remain confidential and only be disclosed on an "as needed basis"
- The details of their disclosure will remain confidential to the extent that is practical in the circumstances and will only be released on an "as needed basis" during the investigation phase, or as required by law
- Referring to the Discloser in a gender-neutral context or by pseudonym
- Redacting all personal information or references to the Discloser
- Securely storing and filing all paper records and supporting documents in a locked space or device
- Securely storing all electronic documents in a private server
- Limiting access to information relating to a disclosure to those directly involved in handling the disclosure
- Providing counselling and support services to Disclosers
- Modifying the Discloser's work duties, schedule, or environment
- Providing Disclosers with the opportunity to take extended leave

- Ensuring that each person who is involved in handling and investigating a disclosure are reminded about the confidentiality and detriment requirements, including that an unauthorised disclosure of a Discloser's identity or detrimental treatment towards the Discloser may be a criminal offence
- Ensuring they will be protected from retaliation, harassment, or victimisation. Should retaliation occur, it will be treated as serious misconduct and the perpetrator of the retaliation will be subject to disciplinary action
- Providing a channel for Disclosers to lodge a complaint if they feel that they have suffered detriment or their identity has been disclosed without their consent.

Whistleblower Protection

Protection afforded to whistleblowers under the Act include:

- Identity protection (confidentiality)
- Protection from detrimental acts or omissions
- Compensation and other remedies
- Civil, criminal and administrative liability protection

These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.

If a Discloser makes a disclosure under this policy in good faith, provided they are not involved in the conduct reported, the Discloser will not be penalised or disadvantaged by the School. Where it is established by the WIO that the Discloser has not acted in good faith or they have intentionally made a false, malicious, or vexatious report of alleged misconduct, then this will be reported to the WPO and may result in the Discloser being the subject of disciplinary action.

Anonymity of a Discloser

The Discloser can remain anonymous during the entire process and even after the investigation is finalised. They do not have to answer any questions that may identify themselves. They can use a pseudonym name and email.

CGGS will refer to the Discloser in a gender-neutral context or by pseudonym and redact all personal information or references to the Discloser.

Identity protection (confidentiality)

Where a Discloser has made a qualifying disclosure, they may request for their identity to remain confidential. In this instance, the School will take all reasonable steps to protect information about the identity of the Discloser or information that is likely to lead to the identification of the Discloser.

The exception to this is when the School discloses the identity of the Discloser:

- To ASIC, APRA, or a member of the Australian Federal Police;
- To a legal practitioner for the purposes of obtaining legal advice or legal representation;
- To a person or body prescribed by regulations; or
- With the consent of the Discloser.

The School may disclose the information contained in a disclosure with or without the Discloser's consent if:

- The information does not include the Discloser's identity;
- The School has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information; and
- It is reasonably necessary for investigating the issues raised in the disclosure.

The Whistleblower Protection Officer, or Whistleblower Investigator will advise the whistleblower if matters change in a way that affects the School's ability to protect the whistleblower's identity and will give the whistleblower as much warning as reasonably possible if it appears likely that their identity will become known.

Information will remain strictly confidential. All digital and physical files created with respect to a whistleblower disclosure and investigation will be kept under the control of the Principal (or the Board Chair as appropriate). Any unauthorised release of information will be regarded as a breach of this policy.

Any staff member who breaches confidentiality is subjected to disciplinary proceedings by the School and may be liable for penalties and fines as well as up to 6 months' imprisonment. A Discloser may lodge a complaint with the School or regulator, such as ASIC, APRA or the ATO, about a breach of confidentiality.

Protection from detrimental acts or omissions

It is an offence under the Act to victimise, threaten, harass, discriminate, or cause detriment to any person who makes a qualifying disclosure. Any staff member found to be in breach is subjected to disciplinary proceedings by the School and may be liable for penalties and fines as well as up to 2 years' imprisonment. The School may also be vicariously liable as an organization if it does not take reasonable precautions and exercise due diligence to avoid the detriment conduct.

Some examples of detrimental conduct may include but is not limited to the following:

- Dismissal of an employee
- Injury of an employee in his or her employment
- Alteration of an employee's position or duties to his or her disadvantage
- Discrimination between an employee and other employees of the same employer
- Harassment or intimidation of a person
- Harm or injury to a person, including psychological harm
- Damage to a person's property
- Damage to a person's reputation
- Damage to a person's business or financial position or
- Any other damage to a person.

On the other hand, examples of actions that are not detrimental conduct may include (where relevant):

- Administrative action that is reasonable for the purpose of protecting a Discloser from detriment (such as moving a Discloser who has made a disclosure about their immediate work area to another department to prevent them from detriment)
- Managing a Discloser's unsatisfactory work performance, which is independent from the disclosable matter.

Compensation and Other Remedies

A Discloser (or any other employee or person) may seek compensation and other remedies through the courts if:

- They suffer loss, damage, or injury because of a disclosure; and
- The School failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Civil, criminal, and administrative liability protection

A Discloser is protected from:

- **Civil liability** such as any action against the Discloser for breach of an employment contract, duty of confidentiality or another contractual obligation
- **Criminal liability** such as attempted prosecution of the Discloser for unlawfully releasing information and
- **Administrative liability** such as disciplinary action for making the disclosure.

These protections applies so long as the Discloser is not a party to the conduct revealed by the disclosure.

Communication of the Policy

This policy will be publicly available on the school's website and will be made available to School Council members and staff in the staff handbook.

Links to other Policies

- Community Code of Conduct (includes Child Safety)
- Mandatory and Reportable Conduct Policy
- Conflict of Interest Policy
- Equal Opportunity Policy
- Complaints Management Policy

Legislative Requirements

- Corporations Act (Cth) 2001

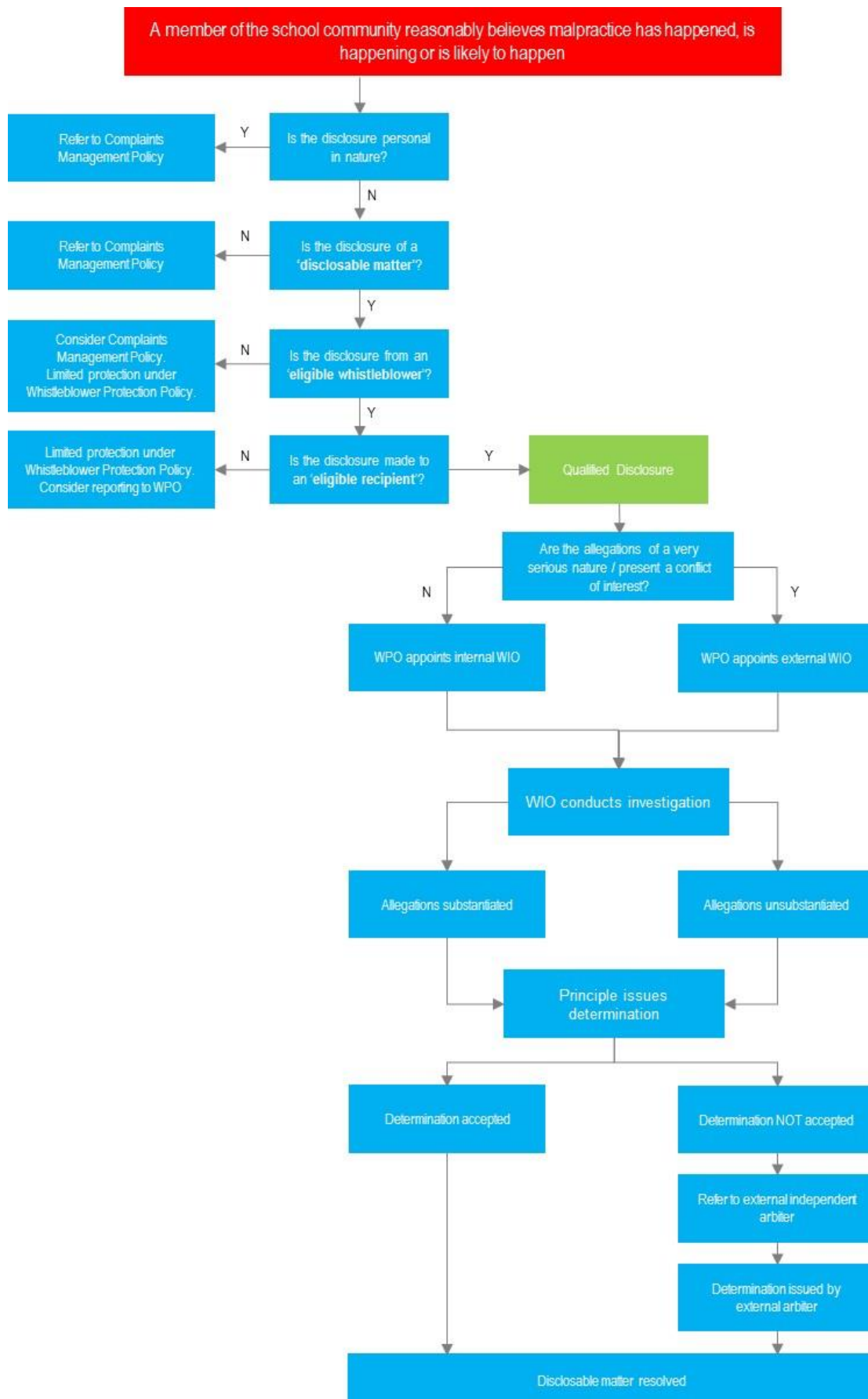
Policy Review

CGGS is committed to the continuous improvement of its whistleblowing program. All whistleblowing incidences are handled in accordance with this policy and reviewed upon completion for opportunities for improvement. Unless otherwise stated, this version of the policy remains in force up to the point when it is superseded by a revised version. This policy will be reviewed annually or more often as circumstances require. Next scheduled review date is November 2024.

Version Control

Version No.	Date Approved	Author	Comments
1.0	25.07.2016	Principal	Initial version.
2.0	13.08.2019	Risk and Compliance Manager	Renamed 'Whistleblower Policy' to 'Whistleblower Protection Policy' Expanded policy to coincide with amendments to the Corporations Act 2001 Added 'Guiding Principle' section, 'Legal Context' section, 'Key Responsibilities' section, 'Making a Report' section, 'Whistleblower Protection' section, 'Penalties' table, 'Conducting an Investigation' section, 'Determination Outcome' section, 'Whistleblower Process Map'
3.0	17.12.2019	Risk and Compliance Manager	Redrafted to align with ASIC Regulatory Guide 270 Amended 'eligible whistleblower' definition, 'eligible recipient' definition Added reference to whistleblowing on tax related matters in 'Legal Context' section, 'Disclosable Matters' section, 'Eligible Recipients' section, 'Support and Practical Protection for Disclosers' section, 'Fair Treatment' section, fair treatment clause in 'Guiding Principles' section Expanded on 'Scope' section, 'Making a Disclosure', 'Whistleblower Protection' section, 'Handling and Investigating a Disclosure' section, 'Policy Review Cycle' section Renamed 'Making a Report' section to 'Making a Disclosure', 'Conducting an Investigation' section to 'Handling and Investigating a Disclosure'
4.0	07.11.22	Risk and Compliance Manager	Streamlining of the Policy and update in line with current organisational chart

Appendix A:



Appendix B:

Whistleblower Disclosure Form

Reporter's Contact Details		Date Lodged:	
Full Name:		Phone:	
Address:		Email:	

Nature of Wrongdoing / Misconduct / Malpractice

Allegation Details
<p>Describe the incident and/or your concerns including:</p> <ul style="list-style-type: none">• The exact nature of the alleged disclosable matter• When the alleged disclosable matter took place (key dates and times, such as when the incident occurred)• Where the alleged disclosable matter took place• List the names of ALL individuals involved or who may be aware of this allegation including witnesses to the event or who may know information that is relevant to the investigation• Details of telephone conversations or emails (attach supporting evidence)• Any other relevant information or suggestions that would assist in this investigation?

<p>Have you discussed this with anyone else?</p> <p>Are you concerned that you or any other person may suffer (or has already suffered) consequences arising from this matter or from its reporting? This may include fear of harassment, coercion, bullying etc</p>
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Preferred Outcome