



**POLICY STATEMENT:**

Ballarat Grammar is committed to maintaining the highest standard of conduct and ethical behaviour in all areas of practice. The School strives to promote an open and honest culture and encourages Board members, staff, parents, students and other individuals who have a relationship with the School to report any unethical behaviour or suspected or actual misconduct.

The School will ensure that any individual who makes a report shall do so without disadvantage or the fear of intimidation.

**DETAIL:**

**Definitions:**

**Whistleblower-** An individual who exposes any kind of information or activity that is deemed illegal, unethical, or inappropriate within an organisation.

**Part 1- Reportable Conduct**

1. An individual should make a report under this Policy if they believe that an individual involved with Ballarat Grammar has engaged in conduct which:
  - 1.1 is dishonest, fraudulent or corrupt;
  - 1.2 is illegal;
  - 1.3 is unethical or in breach of Ballarat Grammar's policies;
  - 1.4 is potentially damaging to Ballarat Grammar, a Ballarat Grammar employee or third party, such as unsafe work practices, environmental damage, health risks or abuse of Ballarat Grammar's property;
  - 1.5 amounts to abuse of authority;
  - 1.6 may cause financial loss to Ballarat Grammar or damage to reputation or be otherwise detrimental to Ballarat Grammar's interests;
  - 1.7 involves harassment, discrimination, victimisation or bullying; or
  - 1.8 involves any other kind of serious impropriety.

**Part 2- Procedure**

1. A whistleblower should promptly, in person, in writing or via email to [headmaster@bgs.vic.edu.au](mailto:headmaster@bgs.vic.edu.au) report the suspected or actual matter to the Headmaster.
2. If the whistleblower is reluctant to report directly to the Headmaster, then they have the right to report the matter to the Anglican Diocese Director of Professional Standards in person, writing – PO Box 337, Canterbury, Vic 3126 or phone 1 800 377 842.
3. It is the whistleblower's absolute discretion whether they choose to report the matter with their identity or anonymously.
4. Ballarat Grammar will investigate all matters reported under this Policy as soon as practical after the matter has been reported.
5. All investigations will be conducted in an objective and reasonable manner, having regard to the nature of the Reportable Conduct and the circumstances.
6. Where the Headmaster and/or the Board of Directors decides the allegations are of a very serious nature, external investigators will be engaged.



7. Where appropriate, at the absolute discretion of the Headmaster and/or the Board of Directors, the School will provide feedback to the whistleblower regarding the investigations.

### **Part 3- General**

1. Ballarat Grammar encourages employees who become aware of known, suspected or potential cases of Reportable Conduct to make a report under this Policy.
2. Ballarat Grammar recognises the importance of ensuring confidentiality in respect of all matters raised in relation to this policy and will do everything in its power to ensure the whistleblower receives no retaliation or retribution for a report that was provided in good faith and not vexatious.
3. The identity of the whistleblower, if known, shall remain confidential to those persons directly involved in applying this Policy, unless the issue requires investigation by external investigators to the Police.
4. If the whistleblower's identity is known, the whistleblower has the option to receive support provided by the Anglican Diocese Director of Professional Standards or their representative.
5. Anyone who retaliates against the whistleblower who reported an event in good faith will be subject to investigation underpinned by procedural fairness. This may result in discipline, including possible termination, as well as to possible criminal and civil penalties under the *Federal Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018*.
6. If an individual makes a vexatious report, they will be subject to the School's normal disciplinary procedures.
7. Crimes against a person or property, should immediately be reported to the Police.
8. Procedural fairness will be applied in dealing with any individuals who are the subject of whistleblowers' reports. Allegations will be documented, and individuals given an opportunity to respond fully to allegations.
9. If the investigation of a report, that was made in good faith and investigated by internal personnel, is not to the whistleblower's satisfaction, then they have the right to report the matter to the Anglican Diocese Director of Professional Standards.
10. The School will monitor and review this Policy regularly to assess its effectiveness and efficiency in encouraging the reporting of Reportable Conduct, protecting the individual making the report and the investigation of reports.
11. The School will ensure the School community is educated in relation to this Policy.