



Whistleblower Procedure

PURPOSE

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 fear of intimidation.

A whistleblower is an individual who exposes any kind of information or activity that is deemed illegal, unethical, or inappropriate within an organisation.

SCOPE

This Whistleblower Procedure applies to all current and former employees, contractors, volunteers, Board members, students, parents and other individuals who wish to make a protected disclosure regarding serious wrongdoing or misconduct.

This procedure is designed to support the School's commitment to integrity, transparency, and accountability and provides a clear process for reporting concerns and ensures that disclosures are managed confidentially, fairly and in a timely manner, and that individuals making disclosures are protected from detrimental action or victimisation.

STATEMENT

Reportable Conduct

- An individual should make a report under this Procedure if they believe that an individual involved with Ballarat Grammar has engaged in conduct which:
 - Is dishonest, fraudulent or corrupt;
 - Is illegal;
 - Is unethical or in breach of Ballarat Grammar's policies / procedures / governance documents;
 - 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;
 - Amounts to abuse of authority;
 - May cause financial loss to Ballarat Grammar or damage to reputation or be otherwise detrimental to Ballarat Grammar's interests;
 - Involves harassment, discrimination, victimisation or bullying; or
 - Involves any other kind of serious impropriety.

General

- Ballarat Grammar encourages anyone who becomes aware of confirmed, suspected or potential cases of Reportable Conduct to make a report under this Procedure using the steps outlined in Appendix A.
- Ballarat Grammar recognises the importance of ensuring confidentiality in respect of all matters raised in relation to this procedure 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.
- The identity of the whistleblower, if known, shall remain confidential to those persons directly involved in applying this Procedure, unless the issue requires investigation by external investigators to the Police.
- If the whistleblower's identity is known, the whistleblower has the option to receive support provided by the Anglican Diocese of Ballarat's Director of Professional Standards or their representative.





- 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) Act 2019*.
- If an individual makes a vexatious report, they will be subject to the School's normal disciplinary procedures.
- Potentially criminal actions against a person or property including offences such as sexual offences, physical assault or significant property damage, should immediately be reported to the Police.
- Procedural fairness will be applied in dealing with any individuals who are the subject of whistleblower's reports. Allegations will be documented, and individuals given an opportunity to respond fully to allegations.
- 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 of Ballarat's Director of Professional Standards.
- The School will monitor and review this Procedure 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.
- The School will ensure the whole School community is educated in relation to this Procedure.

REVIEW

Ballarat Grammar is committed to the continuous review and improvement of all its operations, including this procedure. It is the responsibility of the Headmaster to regularly monitor and review the effectiveness of the Whistleblower Procedure to ensure they are working in practice and revise the document when required and after any related significant incident.

GOVERNANCE DOCUMENT RESPONSIBILITIES AND COMMUNICATIONS

All documentation within the Governance Framework will be communicated throughout the School including, but not limited to, internal communications such as Nexus posts, staff emails, staff inductions and documentation distribution.

Document Owners are responsible for identifying and managing information-related risks and issues for their assigned information entities and for escalating these to Approval Authorities accordingly. Owners of Governance Documents are accountable for their respective procedures, manuals and work instructions in alignment with their position descriptions.





Appendix A – Procedures for Reporting

	Actions	Responsibility	Steps
A	Action requiring reporting identified	<ul style="list-style-type: none">Whistleblower	<ul style="list-style-type: none">A whistleblower should promptly, in person, in writing or via email to headmaster@bgs.vic.edu.au report the suspected or actual matter to the Headmaster or Deputy Head of the School.A report can also be made to Integrity Line, which is a confidential, independent provider for individuals to make reports. Integrity Line can be contacted via phone on 1800 468 456 or online at https://integrityline.com.au/. Reports made to Integrity Line are not investigated by Integrity Line but are forwarded to the nominated person at Ballarat Grammar who will investigate the matter.If the whistleblower is reluctant to report directly to the Headmaster, then they have the right to report the matter to the Anglican Diocese of Ballarat's Director of Professional Standards at any time via email – dps@ballaratanglican.org.au or phone – 1800 377 842.It is the whistleblower's absolute discretion whether they choose to report the matter with their identity or anonymously.
B	Report received	<ul style="list-style-type: none">HeadmasterBoard of Directors	<ul style="list-style-type: none">Ballarat Grammar will investigate all matters reported under this Procedure as soon as practical after the matter has been reported.All investigations will be conducted in an objective and reasonable manner, having regard to the nature of the Reportable Conduct and the circumstances.Where the Headmaster and/or the Board of Directors decides the allegations are of a very serious nature, external investigators will be engaged.All documentation relating to the report will be stored confidentially in accordance with the School's record keeping procedures.
C	Feedback	<ul style="list-style-type: none">HeadmasterBoard of Directors	<ul style="list-style-type: none">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.



Office Use Only

Document Control / History	
Document Code	CGS - 015
Approval Authority	Headmaster
Document Owner / Responsible Officer	Headmaster
Original Approval Date	January 2022
Current Version Date	May 2025
Scheduled Review Date	January 2026
History	May 2025 – minor changes due to template upgrade

Supporting Documents	
• CGS-001 - Corporate Governance & Sovereign Risk Policy	• CGS-005 - Complaints & Compliments Handling Procedure

Student Lifecycle / Pillars / Values / IDEALS / IB PYP Attributes					
Student Lifecycle	Student Lifecycle Subsection	Pillars	Values	IDEALS	IB PYP Attributes
<ul style="list-style-type: none"> Student Recruitment Delivery of Education Programs Graduation & Community 	<ul style="list-style-type: none"> Marketing & Advertising Enrolments & Offers Finance Teaching & Learning Assessment Experiences Careers / Work Experience Graduation Old Grammarians / Alumni 	<ul style="list-style-type: none"> Governance & Leadership Legislative & Regulatory Compliance Complaints & Compliments People & Culture Finance Community Engagement / Foundation Property & Maintenance 	<ul style="list-style-type: none"> Integrity Aspiration Courage Compassion Responsibility Hope 	<ul style="list-style-type: none"> Internationalism Democracy Environmentalism Adventure Leadership Service 	<ul style="list-style-type: none"> Inquirers Knowledgeable Thinkers Communicators Principled Open Minded Caring Risk Takers Balanced Reflective

Legislative Context
<ul style="list-style-type: none"> Federal Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 - Federal Register of Legislation Privacy Act 1988 (Cth) Federal Register of Legislation - Privacy Act 1988 Australian Privacy Principles

Regulatory Context				
VRQA	CRICOS / National Code / ESOS Act	ACECQA / Department of Education	International Baccalaureate	Other
<ul style="list-style-type: none"> Education & Training Reform Act 2006 (Vic) – s4.3.1 VRQA Minimum Standards for School Registration – Schedule 4 Child Safe Standards (Victoria) 	<ul style="list-style-type: none"> National Code of Practice for Providers of Education & Training to Overseas Students 2018 9National Code – Standard 6 ESOS Act 200 – Section 21 	<ul style="list-style-type: none"> ACQCQA / National Quality Framework (NQF) – Quality Area 7 	<ul style="list-style-type: none"> IB Standards & Practices 2020 – requirement for ethical leadership and clear reporting structures for misconduct 	<ul style="list-style-type: none"> Federal Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 – s1317AA to s1317AJ Corporations Act 2001 (Cth) – Division 2, Part 9.4AAA Privacy Act 1988 (Cth) Australian Privacy Principles (APPs) Privacy & Data Protection Act 2014 (Vic) Crimes Act 1958 (Vic)