KOROWA

Whistleblower Protection Policy

Purpose

The purpose of this Policy is to:

- Encourage the reporting of misconduct and improper conduct
- Provide strong protections for individuals who make disclosures in accordance with this Policy
- Ensure disclosures are handled appropriately, confidentially, and in a timely manner
- Support a culture of integrity, accountability, and student safety within the School

Scope

This Policy applies to all Eligible Whistleblowers, including:

- Current and former employees
- Responsible persons
- School board members
- Contractors and third-party suppliers
- Volunteers
- Current and former students and parents/guardians

This policy operates alongside our mandatory reporting obligations under Victorian child protection laws and the School's Child Protection Program. Reporting of child safe matters are dealt with in our Child Protection Policies and Procedures.

Disclosable Matters

A disclosure qualifies for protection if the discloser has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances.

Disclosable matters include, but are not limited to:

- Illegal conduct or breaches of law (including the Corporations Act)
- Fraud, corruption, theft or dishonesty
- Unethical or improper conduct
- Unsafe work practices or conduct endangering health and safety
- Conduct posing a risk to students or child safety (this is covered under our Child Protection Program)
- Serious breaches of School policies
- Conduct that may cause financial or reputational harm to the School
- Any conduct representing a danger to the public

This Policy does not apply to personal work-related grievances, which are addressed under our Staff Grievance and Complaints Resolution Policy, unless they include victimisation or systemic misconduct.

Who Can Receive a Disclosure

Disclosures may be made to:

Internal recipients

- Risk & Compliance Manager
- Chair of the School Risk Committee
- Principal
- Any member of the School Executive

External recipients

- The School's external auditor or a member of the audit team
- Regulators
- A legal practitioner (for the purposes of obtaining legal advice)

The School encourages disclosures to be made internally where appropriate to support timely resolution.

How to Make a Disclosure

Disclosures should be made:

- Via email to the Risk and Compliance Manager whistleblower@korowa.vic.edu.au
- In writing to the Risk & Compliance Manager, Korowa Anglican Girls School, 10-16 Ranfurlie Crescent, Glen Iris, 3146
- Via email to the School Council via the Chair of the Risk Committee council@korowa.vic.edu.au

If the report relates to conduct of the Risk and Compliance Manager or the Chair of the School's Risk Committee the report should be made to the Principal (principal@korowa.vic.edu.au) who will follow the procedures set out in this Policy.

Disclosures may be made anonymously and still receive protection under the law.

Confidentiality and Anonymity

The School is committed to protecting confidentiality:

- It is illegal to disclose the identity of a whistleblower or information likely to identify them, unless permitted by law. Breach of confidentiality obligations may result in serious penalties.
- Information will be shared strictly on a need-to-know basis.
- All records will be stored securely.

Anonymous disclosures will be accepted and investigated where sufficient information is provided.

Protection from Detriment

The School strictly prohibits any form of detriment against a whistleblower, including:

- Dismissal, demotion or disciplinary action
- Harassment, intimidation or discrimination
- Injury (including psychological harm)
- Reputational or financial damage

These protections apply even if a disclosure is subsequently unsubstantiated, provided it was made on reasonable grounds.

A whistleblower who suffers detriment may seek compensation and remedies under the law.

Investigating a Disclosure

Investigation Approach

All disclosures will be assessed and, where appropriate, investigated promptly and thoroughly.

Investigations may be conducted by:

- Appropriate school staff
- External independent investigators (where appropriate).

Procedural Fairness and Investigation Standards

All investigations conducted under this policy will be undertaken in accordance with the principles of procedural fairness (also known as natural justice), including that:

- Any person who is the subject of a disclosure will be treated fairly and provided with an opportunity to respond to the allegations before any findings are made, where appropriate
- Investigations will be conducted impartially, without bias, and based on evidence
- Findings will be made objectively and on the balance of probabilities.

The School will take reasonable steps to ensure that the process does not unfairly prejudice any person who is the subject of a disclosure.

Management of Conflicts of Interest

The School will actively identify and manage any actual, perceived or potential conflicts of interest in the handling and investigation of disclosures.

- Any person involved in receiving or investigating a disclosure must declare actual, perceived or potential conflicts of interest as soon as they arise
- Where a conflict exists, the matter will be referred to an alternative member of school staff or an appropriately qualified external investigator
- In higher-risk or sensitive matters, the School may appoint an independent external investigator to ensure objectivity and integrity of the process

Confidentiality During Investigation

To protect the whistleblower:

- Information will only be shared where reasonably necessary
- Steps will be taken to reduce the risk of identification
- Disclosures of information will comply with legal requirements.

Timeframes and Communication

The School will endeavour to conduct investigations in a timely manner, having regard to the nature, complexity and urgency of the matter.

- While it may not always be possible to set fixed timeframes, the School will aim to commence investigations promptly after a disclosure is received.
- Where appropriate and lawful, the whistleblower will be kept informed of the progress of the investigation, including indicative timeframes and any significant developments.
- Delays will be minimised where possible, and reasons for any significant delay will be documented.

Outcomes

At the conclusion of an investigation:

- Appropriate action will be taken where allegations are substantiated
- The whistleblower will be informed of the outcome (subject to privacy constraints)
- Where the Eligible Whistleblower is not happy with the outcome, they may seek a review directly from the Principal or Chair of the School Council.

False or Misleading Disclosures

The School encourages all genuine disclosures.

Abuse of the whistleblower reporting process and the making of false reports will not be tolerated and may be treated as a serious breach of the School's Code of Conduct. Disclosures made without reasonable grounds may lead to disciplinary action; however, a disclosure will not be considered false simply because it is unsubstantiated. False reports may also impact our relationships with third parties and may result in termination of that relationship.

Interaction with Child Safety Obligations

This Policy operates alongside:

- The Victorian Child Safe Standards and the Schools obligations under MO 1359 re reporting of child safety and wellbeing matters
- Mandatory reporting obligations
- The School's Child Protection Program

Where a disclosure relates to child safety and/or mandatory reporting obligations all other legal obligations will be complied with.

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Training and Awareness

The School will:

- Provide training to staff responsible for receiving and investigating disclosures
- Promote awareness of this Policy across the entire School community
- Ensure the Policy is accessible via the School website and intranet

This ensures transparency and that all staff, responsible persons and other parties have easy access to the policy.

Policy Review

This Policy will be reviewed at least every two years or earlier if required due to:

- Legislative changes
- Incidents
- Governance requirements
- Identified gaps in implementation.

Governance

The School Council is responsible for oversight of this Policy as part of its governance and risk management framework.