



POLICY TITLE: WHISTLEBLOWER POLICY

DEVELOPED/REVIEWED BY

Chief Operating Officer
Governance Committee

REVIEW SUMMARY

This policy has been reviewed and updated to ensure compliance with the *Corporations Act 2001* (Part 9.4AAA) and the Victorian Child Safe Standards (2022). The review strengthens provisions around child safety, reinforces the School’s commitment to a strong speak-up culture, and provides clarity around procedures and protections for whistleblowers.

DOCUMENT DEVELOPMENT PROCESS

The original Whistleblower Policy was created in August 2019 and reviewed in April 2023. In August 2025, the document was updated to reflect current legislation, best practice standards, and the requirements of the Victorian Child Safe Standards. The updated version has been endorsed by the Governance Committee and ratified by the School Council.

RATIONALE

The King David School is committed to ethical conduct, integrity, accountability and the safety of all members of its community. A strong speak-up culture is essential to safeguarding the wellbeing of children and young people, and to ensuring that all members of the School community feel confident to raise concerns. This policy exists to ensure that concerns about reportable conduct can be raised safely, confidentially and without fear of reprisal.

DEFINITIONS

whistleblower	Any person who makes a disclosure about reportable conduct in good faith.
reportable conduct	Includes behaviours or actions that are dishonest, unethical, unsafe, unlawful, abusive (including child abuse), or otherwise detrimental to the School.
whistleblower protection officer (WPO)	Is the designated officer, currently the Human Resources Manager, who is responsible for receiving and investigating disclosures.
speak-up culture	An environment in which all members of the School community feel safe, supported and encouraged to raise concerns, particularly where those concerns relate to child safety.

PRINCIPLES/GUIDING PRINCIPLES

The School is committed to protecting the confidentiality of whistleblowers and ensuring they are not subjected to victimisation or detrimental action. All disclosures will be managed respectfully and in line with natural justice and procedural fairness. Reports must be made honestly and in good faith, and investigations will be carried out fairly and impartially.

Name of Document: Whistleblower Policy	Version No. 2	Date: February 2026	Authorised by: School Council 23 Feb 2026
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The School prioritises the safety and wellbeing of children. Speaking up about child safety concerns is considered both a responsibility and a right. This policy aims to ensure that every member of the School community, including students, parents, staff, volunteers and Council members, is able to raise concerns without fear.

The School also recognises its responsibility to act on concerns raised, to respond appropriately, and to provide feedback to whistleblowers where it is possible and appropriate to do so.

PROCEDURES

Who can Report

Reports can be made by students, parents, staff, volunteers and Council members.

What can be Reported

Concerns may include dishonesty, unethical or improper conduct, unsafe work practices, child abuse or neglect, illegal acts such as theft, violence or drug use, breaches of law, or any other behaviour that is detrimental to the School.

How to Report - Employees

Where an employee of The King David School believes in good faith on reasonable grounds that any other employee, volunteer, or contractor has breached any provision of the general law or engaged in reportable conduct, that employee must report their concern to:

- their supervisor: or, if they feel that their supervisor may be complicit in the breach,
- the Principal: or, if they feel that the Principal may be complicit in the breach,
- the Whistle-blower Protection Officer (the Human Resources Manager acts in the capacity as the WPO)

or, if they feel this to be necessary,

- the duly constituted authorities responsible for the enforcement of the law in the relevant area.

How to Report - Other Members of the School Community

A student, parent, volunteer, Council member or other person of the School who wishes to make a report in connection with reportable conduct should contact the Human Resources Manager, who acts in the capacity as the Whistle-blower Protection Officer on 03 9527 0116 or in writing sent to wpo@kds.vic.edu.au. If this is inappropriate, then they should contact the Chief Operating Officer on 03 9527 0115.

Protections

The School is committed to ensuring the Whistle-blower Protection Officer (WPO) is appropriately qualified for this role and readily accessible.

All reports will be kept confidential and secure. The person making their concern known shall not suffer any sanctions from the organisation on account of their actions in this regard provided that their actions:

- are in good faith, and
- are based on reasonable grounds, and
- conform to the designated procedures.

The person making the report will be kept informed of the progress of the investigation. Any person who, having made a report, believes that they have been personally disadvantaged has an automatic right of appeal to School Council whose decision will be complied with.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the School.

Investigation Procedures

All reports of reportable conduct will be subject to thorough investigation by the Whistle-blower Protection Officer.

Best practices will be followed by the Whistle-blower Protection Officer who will be fair and independent of the person who made the report and the person who is the subject of the reportable conduct. The investigation shall observe the rules of natural justice and the provisions of procedural fairness.

The investigation will include the following steps:

1. Full details of the allegations obtained;
2. Person against whom allegations are made is informed;
3. Principal or School Council President provided with details of the allegations as appropriate;
4. Involvement of external parties such as the police considered by Principal or School Council President as appropriate;
5. Allegations fully investigated;
6. Principal or School Council President decide on action to be taken; and
7. The person making the report will be kept informed of the progress of the investigation.

Where the Principal or the School Council President decides that the allegations are of a very serious nature, external investigators will be engaged.

The identity or any information that could lead to the identity of a person who has made a report will not be released to any person who is not involved in the investigation/resolution of the matter.

RESPONSIBILITY

- Principal
- All King David Staff
- All King David Community

RELATED LEGISLATION

- Corporations Act 2001 (Part 9.4AAA)
- Child Wellbeing and Safety Act 2005 (Vic)
- Education and Training Reform Act 2006 (Vic)
- Victorian Child Safe Standards 2002 (Vic)

RELATED POLICIES

- Child Safety and Wellbeing Policy May 2024
- Respectful Workplace Policy September 2025
- School Complaints Policy May 2024

RELATED DOCUMENTS

- Safeguarding Children and Young People Code of Conduct
- Staff and Student Professional Boundaries
- Parent Code of Conduct
- Student Code of Conduct

NEXT REVIEW

February 2029