



The
Anglican
Schools
Corporation

Whistleblowing Policy

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Responsible Officers		Chief Risk Officer Director, People Advisory		

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1. Our commitment

The Anglican Schools Corporation (Corporation) is committed as a faith-based organisation to a culture of respect and ethical conduct in the way we work and relate to each other. Our commitment is supported by the Corporation Board.

We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report misconduct.

We will not tolerate corrupt, illegal or other undesirable conduct nor condone victimisation of anyone who intends to disclose or has disclosed misconduct.

2. Policy applies to

This policy applies to anyone whilst performing work for us or doing something in connection with their work for us. It includes directors, board members, school council chairs and members, principals, chief executive officer and, Corporation officers, managers, employees (full-time, part-time and casual), volunteers, contractors, work experience students, and consultants (collectively referred to as '**Employees**').

3. Objectives of this policy

The objects of this policy are to:

- Encourage and allow employees to disclose misconduct
- Ensure misconduct is identified and properly dealt with
- Ensure the identity of those making a disclosure (whistleblower) and the content of the disclosure are kept confidential
- Support and protect anyone from victimisation relating to the disclosure

4. Every employees' responsibility

Every employee has a responsibility to:

- remain alert to misconduct
- report known or suspected misconduct in accordance with this Policy
- act in a way that reduces, prevents or stops misconduct
- support (and not victimise) those who have made or intend to make a disclosure
- to ensure the identity of the whistleblower and the person/s who is the subject of the disclosure are kept confidential



5. What should be reported

If you have seen or have reasonable grounds to suspect misconduct, report it through the two processes available (detailed below).

Misconduct includes but is not limited to:

- Dishonest, corrupt or illegal conduct
- Theft, fraud or misappropriation
- Damage/sabotage, violence, drug and alcohol sale/use;
- Risks to the workplace health and safety
- Inappropriate or unethical conduct
- Misuse of information
- Bullying, discrimination, harassment or other unacceptable behaviour
- Significant breach of the Corporation, school or college Code of Conduct, internal policies and procedures or the law
- Serious and substantial waste of the Corporation resources
- Victimising someone for making a disclosure
- Causing substantial financial or non-financial loss or detriment the Corporation
- Other serious improper conduct

(collectively referred to as “**Misconduct**”)

6. Reporting misconduct

There are two ways to report misconduct (making a disclosure).

1. Internal disclosure process

This policy is not intended to replace or alter your first obligation which is to resolve matters quickly and internally where appropriate. You are encouraged to continue raising misconduct at any time with your supervisors and managers and to make every attempt to report and resolve misconduct informally and internally.

Refer to the procedure for internal formal disclosures as per the Grievance Policy approved by the Board.



2. External disclosure process

If you are not comfortable or able to report misconduct internally, you may make a disclosure to the Corporation's external and independent whistleblowing service provider (whistleblowing service) to receive and manage your disclosure with impartiality and in strict confidence. The whistleblowing service is the go-between between you and the Corporation.

This option allows you to:

- remain completely anonymous
- identify yourself to the whistleblowing service only
- identify yourself to both the whistleblowing service and the Corporation

Once an external disclosure has been made via the external disclosure process, the Corporation must review the disclosure report and assess the appropriate action that needs to be taken (which is detailed in Appendix A).

7. Confidentiality and privacy

The Corporation and the whistleblowing service will treat disclosures in the strictest confidence. All reports and records relating to a disclosure will be stored securely and able to be accessed only by authorised persons.

8. Protection against victimisation

We will do everything reasonably possible to protect anyone who intends to or actually makes a disclosure, acts as a witness or otherwise assists with the investigation and resolution of the disclosure from victimisation.

We will thoroughly assess reports of victimisation. If proven, those who have victimised another will be subject to management action including disciplinary action up to dismissal.

Nothing in this policy is intended to abrogate or diminish any additional or alternative protections which may be available at law.



9. Immunity from disciplinary action

We want you to speak up against misconduct.

Anyone who makes a disclosure:

- with reasonable grounds for suspecting misconduct has or may occur, and
- has not engaged in serious misconduct or illegal conduct relating to the disclosure

will be provided with immunity from disciplinary action.

NOTE: The Corporation has no power to offer any person immunity against prosecution in the criminal jurisdiction. Immunity against prosecution can only be granted, in most jurisdictions, by the Director of Public Prosecutions.

10. Consequences of making a false disclosure

Anyone who knowingly makes a false disclosure or who fails to act honestly without any reasonable belief of the misconduct may be subject to disciplinary action, including dismissal.

The disciplinary action will depend on the severity, nature and circumstance of the false disclosure.



Appendix A

1. External disclosure process

We have contracted Your Call Whistleblowing Solutions (“Your Call”) as the whistleblowing service.

The whistleblowing service reporting options include:

- *Website* <https://www.yourcall.com.au/report>
24/7
- *Telephone* 1300 790 228
9am and 12am, recognised business days, AEST

Online reports can be made via the website address listed above. You will be required to enter the Corporation's unique identifier code: **ASC**

The Corporation Whistleblower Protection Officers who will have access to your report include:

1. Chief Executive Officer
2. Chief Risk Officer
3. Director, People Advisory

Your Call can circumvent any of the above Officers upon your request.

The whistleblowing service will avoid any of these Officers at your request. After making a disclosure, you will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board.

The Message Board allows you to:

- communicate with the whistleblowing service and/or the Corporation without revealing your identity
- securely upload any relevant documentation and/or material that you wish to provide
- receive updates
- request support or report victimisation

You may continue using the Message Board for as long as you wish.

If you cannot access the Message Board, you may contact the whistleblowing service via phone (above) for verbal updates.



2. National relay service

If you are deaf, or have a hearing or speech impairment, you can contact the whistleblowing service online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request the whistleblowing service's hotline.

3. Supporting evidence of misconduct

We do not expect a disclosure to include absolute proof of misconduct. If possible, it should include:

- Names, dates, times, locations
- A description of the misconduct
- Names of anyone who may substantiate the disclosure
- Anything that supports the disclosure such as email, documents, CCTV

These details will assist us in deciding how best to deal with and resolve the disclosure.

4. Will my identity be treated confidentially?

Your identity will not be disclosed by the whistleblowing service or the Corporation unless:

- You consent to disclosing your identity
- The disclosure is required by law
- It is necessary to prevent a serious threat to a person's health or safety

An unauthorised disclosure of:

- The identity of a whistleblower
- Information from which the identity of the whistleblower could be inferred

will be regarded as a disciplinary matter and disciplinary action up to dismissal may be taken.

As a whistleblower you may request the whistleblowing service to provide special protection measures, if your identity is likely to be disclosed from the information in the disclosure. Requests will be considered taking into account both the interests of the whistleblower and the Corporation.

5. Support

The Corporation Whistleblower Protection Officer will refer anyone who has or is in the process of making a disclosure support through the Corporation's EAP service.

6. What happens after I make a disclosure to the whistleblowing service?

The whistleblowing service is the external go-between between you and the Corporation.

The whistleblowing service will:

- Receive the disclosure you make to the whistleblowing service
- Make a record of the information you provide
- Ensure your identity is kept confidential, if you wish
- Allow you to access the whistleblowing service Message Board to enable you to communicate with the Corporation. You may post questions and information online for the attention of the Corporation, if you wish you can remain anonymous throughout the communications
- The whistleblowing service will refer the disclosure, including the information and documents provided by you, to the Corporation within one business day

Please Note: The whistleblowing service is not the decision maker. All decisions relating to the disclosure are entirely the role and responsibility of the Corporation.

7. What will the Corporation do with the disclosure?

The Whistleblower Protection Officer (WPO) will receive the disclosure from the whistleblowing service. The WPO is appointed by the Corporation to liaise between the Corporation and the whistleblowing service.

The WPO will:

- Carefully assess the information provided to decide the best action to take, including whether an investigation is required, to determine whether the misconduct is proven or not proven
- Maintain the information provided in a confidential and secure manner
- Oversee and coordinate the investigation where an investigator has been appointed
- Advise the whistleblower (through the whistleblowing service where anonymity is requested) of the progress of the matter to the extent it is legally permissible and appropriate to do so

- Take all reasonable steps to ensure the identity of the whistleblower and the person/s who is the subject of the disclosure are kept confidential

The WPO will also consider the employee assistance, welfare and protection needs of a whistleblower and safeguard their interests in accordance with this policy and the law.

8. What happens, if the misconduct is proven?

If the misconduct is proven, the Corporation will decide what action to take including disciplinary action up to dismissal and whether the misconduct would need to be reported as per section 13 below.

The disciplinary action will depend on the severity, nature and circumstance of the misconduct.

9. Will the whistleblower be kept informed?

Subject to privacy and confidentiality requirements the whistleblower will be kept informed of:

- relevant progress of the disclosure
- the outcome of the disclosure

to the extent that it is legally permissible and appropriate to do so.

10. Appointment of an investigator

If an investigation is necessary, the Corporation will appoint:

- an investigator who is independent of the business unit concerned, the whistleblower or any person involved in the disclosure, or
- an external investigator

to investigate the disclosure.

11. Role of investigator

The investigation must be conducted in a constructive, impartial and lawful way and according to the principles of natural justice and procedural fairness.

The Investigator will:

- gather information, material and documentation relating to the disclosure as quickly as possible. (This may involve taking steps to protect or preserve documents, materials and equipment.)



- take a statement or record of interview and/or tape all formal interviews with witnesses as required
- store information gathered in the investigation securely
- take all reasonable steps to protect the identity of the whistleblower. (Where disclosure of the identity of the whistleblower cannot be avoided due to the nature of the allegations, the investigator will warn the whistleblower of this probability)
- complete the investigation and provide a report of the investigation to the Corporation

12. Investigator's report

At the conclusion of the investigation, the investigator will provide a written report to the Corporation including:

- Finding/s of all relevant facts
- Whether the disclosure is proven, not proven or otherwise
- Recommendation/s, when requested to do so, as to any action that may be taken in respect of the findings

The Corporation will use the report to decide appropriate action in resolving the disclosure.

The findings will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

13. Reporting requirements

The Corporation will refer:

- the information in the disclosure
- the findings of an investigation has revealed conduct that may constitute a legal or criminal offence

to an external agency, such as the police, regulator when required to do so under a State or Commonwealth law.



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14. Assistance to other persons involved in the disclosure

The Corporation and the whistleblowing service:

- accept that everyone who is involved in the disclosure must also be supported and protected during the investigation and at all relevant times thereafter
 - witness/s,
 - the person against whom a disclosure is made
- will take all reasonable steps to ensure their confidentiality is not disclosed
- will not disclose any information relating to the matter unless it is legally permissible and appropriate or necessary to do so