



Bacchus Marsh  
Grammar

# Whistleblower Policy

GOV-071 School Board Whistleblower Policy

Approved by the School Board and effective from 2 November 2022



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## 1 Purpose and Objectives

- 1.1 Bacchus Marsh Grammar (**the School**) is committed to fostering a culture of legal, ethical and proactive complaint management behaviour and best practice corporate governance. The School recognises the value of transparency and accountability in its administration and management practices and supports the reporting of improper conduct.
- 1.2 This School Whistleblower Policy (**Policy**) has been developed so that people can raise concerns regarding situations where they believe that the School or anybody connected with the School and associated with School business, has acted in a way that constitutes serious wrongdoing, including unethical, illegal, corrupt or other inappropriate conduct in connection with the School as set out in the Policy.
- 1.3 The objectives of this Policy are to:
  - Support the School's values, code of conduct, policies and procedures that set out the behavioural expectations of persons involved with the School;
  - Deter wrongdoing;
  - Encourage the reporting of actual and suspected wrongdoing that may materially damage the School's reputation and/or cause material financial or non-financial loss to the School;
  - Describe clearly the process for making a whistleblower disclosure and the types of matters that should be reported;
  - Describe clearly the process for managing and appropriately investigating a whistleblower disclosure;
  - Outline how the School manages whistleblower disclosures in a way that supports and protects the whistleblower (including protecting their identity and protecting them from reprisals), provides fair treatment to persons named in whistleblower disclosures, facilitates appropriate investigation of whistleblower disclosures and provides for the secure storage of the information provided and gathered; and
  - Meet the requirements of and give effect to the whistleblower legislation protection provisions in *the Corporations Act 2001* (Cth) and the regulatory guidance set out in the Australian Securities and Investments Commission Regulatory Guide 270 Whistleblower Policies.

## 2 Policy

- 2.1 The School is committed to ethical behaviour that is aligned with its values and complies with all relevant laws.
- 2.2 The School recognises that people who have a work, service or customer relationship with the School are often best placed to identify illegal or other undesirable conduct, but may remain silent for various reasons, including that:
  - There is not a clear mechanism for them to speak up;
  - They are concerned that they may not have sufficient evidence to support their disclosure;
  - They believe action will not be taken; or
  - They believe they may suffer detriment if they report the matter.
- 2.3 The School is committed to providing a supportive environment for any person making a whistleblower disclosure and will always strive to ensure that every whistleblower is protected from detriment as a result of blowing the whistle. This includes protection from dismissal or demotion, any form of reprisal including retaliation, harassment or victimisation.

## 3 Definitions

The words and terms used in this Policy have the following meaning:

**Act** means the *Corporations Act 2001* (Cth).

**APRA** means the Australian Prudential Regulation Authority

**ASIC** means the Australian Securities and Investments Commission.

**Associate** under the Act includes a director or secretary of the School (the relevant body corporate), a related body corporate and a director or secretary of a related body corporate.

**ATO** means the Australian Taxation Office.

**Detriment** means:

- (a) Dismissal of a person's employment;
- (b) Injury to a person in their employment;
- (c) Alteration of an employee's position or duties to their disadvantage;
- (d) Discrimination towards a person;
- (e) Harassment or intimidation of a person;
- (f) Harm or injury to a person, including psychological harm;
- (g) Damage to a person's property, reputation or business or financial position; or
- (h) Any other damage to a person.

Examples of actions that are not detrimental conduct include:

- (a) Administrative action that is reasonable for the purpose of protecting a Whistleblower from Detriment (e.g. moving a Whistleblower who has made a Disclosure about their immediate work area to another office to prevent them from Detriment); and
- (b) Managing a Whistleblower's unsatisfactory work performance, if the action is in line with the School's performance management framework.

**Discloser** means a person who has made an eligible Disclosure under the Policy.

**Disclosure** means providing information about actual or suspected Serious Misconduct in accordance with this Policy.

**Eligible Recipient** means an officer, senior manager, auditor or actuary of the School, or alternatively the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by law.

**Serious Misconduct** means an allegation of illegal conduct or serious sport integrity breaches, including but not limited to:

- (a) Conduct of a serious nature which may involve illegal conduct (for example abuse or child abuse);
- (b) fraudulent or corrupt activity, including theft of money or other property, bribery, improper use of funds, or exploiting their position to achieve a benefit for themselves or another person or entity;
- (c) conduct that seriously endangers the health and safety of employees or contractors;
- (d) failure to comply with, or breach of legal and regulatory requirements, including the Act, *ASIC Act 2001* (Cth), or conduct that constitutes an offence under a law of the Commonwealth;
- (e) engaging in or threatening to engage in detrimental conduct against a person who has made a Disclosure or is believed or suspected to have made, or be planning to make, a Disclosure.

**Whistleblower** means a person who makes a Disclosure in accordance with this Policy.



**Whistleblower Protection Officer** means the person(s) who is appointed by the School to receive and where appropriate, manage Whistleblower complaint matters under this Policy.

Unless otherwise defined in this section, all terms have the meaning as defined in the Act.

## 4 Who can make a Disclosure?

4.1 An individual who is, or has been:

- (a) An officer (current or former) of the School (e.g. a director or company secretary);
- (b) An employee (current or former) of the School that the disclosure is about;
- (c) A contractor, or an employee of a contractor, who has supplied goods or services to the School (whether paid or unpaid);
- (d) A volunteer of the School;
- (e) An Associate (as defined in the *Corporations Act 2001* (Cth) of the School);
- (f) A relative of an individual referred to in sub points (a) to (e) above; or
- (g) A spouse or dependent of an individual referred to in sub points (a) to (e) above,

can be a Whistleblower, make a disclosure and receive the protection that is afforded under this Policy. These persons are otherwise known under the Act as 'eligible whistleblowers'. Students, parents, carers and other key stakeholders of the School are not Whistleblowers under the Policy unless they fit into one of the categories noted above and below. This does not preclude students, parents and carers from making a Whistleblower disclosure, but they may not be afforded the protections under the Act and this Policy.

4.2 While a Whistleblower must hold or have held one of these roles above to access the protections, the Whistleblower does not have to identify themselves or their role and can raise their concerns anonymously. Examples of the type of conduct that may be reported under this Policy, and the conduct that is not protected under this Policy, are contained in the table below.

Who can make a Disclosure under this Policy?	Examples of what a Disclosure can be about under this Policy?	What matters are not protected or investigated under this Policy?
A current or former officer of the School (e.g. a director or company secretary).	Serious Misconduct matters as defined in this Policy (for example, child abuse, financial irregularities)	Personal employment-related grievances, including conflict with other officers or employees and reasonable management action taken in relation to the terms and conditions of engagement, transfer or promotion, demotion, suspension, disciplinary action or termination
A current or former employee of the School	Conduct concealing reportable conduct	Frivolous or vexatious reports or reports made for malicious reasons, personal gain or an ulterior motive
A current or former contractor, or an employee of a contractor, who has supplied goods or services to the School	Fraudulent or corrupt activity, including theft of money or other property, bribery, improper use of funds, or	Deliberately false reports (i.e. that the Whistleblower knows to be untrue)



	exploiting their position to achieve a benefit for themselves or another person or entity	
A current or former volunteer of the School (supplying unpaid services to the School)	Conduct that seriously endangers the health and safety of employees or contractors of the School	Reports that are not supported by facts or circumstances that provide a reasonable basis for making a Disclosure
A relative of an individual referred to above	Failure to comply with, or breach of legal and regulatory requirements, including the <i>Corporations Act 2001 (Cth)</i> , <i>ASIC Act 2001 (Cth)</i> , or conduct that constitutes an offence under a law of the Commonwealth.	
A spouse, relative or dependent of an individual referred to above	Engaging in or threatening to engage in detrimental conduct against a person who has made a Disclosure or is believed or suspected to have made, or be planning to make, a Disclosure	

4.3 Part IVD of the *Taxation Administration Act 1953 (Cth)* (**Taxation Act**) provides corresponding protections to eligible Whistleblowers for disclosure that relates to an entity's, in this case the School's, tax affairs. Information about tax whistleblowers is published on the Australian Taxation Office website. References throughout this Policy to the Act whistleblower protections are also a reference to the whistleblower protections under the Taxation Act. It should be noted that there are differences between the two whistleblower protection regimes with respect to who may make a disclosure, to whom a disclosure may be made and what is a disclosable matter.

## 5 How to make a Whistleblower Disclosure

- 5.1 A Disclosure can be about Serious Misconduct (refer to the Definitions section of this Policy above).
- 5.2 A person making a Disclosure under this Policy must have reasonable grounds to suspect that a person involved with the School has engaged in Serious Misconduct and share whatever information they have available to them in respect of the Disclosure.
- 5.3 A Disclosure should not be:
- (a) About personal employment-related grievances, including conflict with other employees and reasonable management action taken in relation to the terms and conditions of engagement, transfer or promotion, demotion, suspension, disciplinary action or termination. Disclosures of this kind will not be protected or investigated under this Policy;
  - (b) Frivolous, vexatious, raised for malicious reasons or made for personal gain or an ulterior motive;
  - (c) Deliberately false (i.e. the Whistleblower knows to it to be untrue); or
  - (d) About something that the Whistleblower does not have reasonable grounds for believing is correct or likely to be correct, or where there are no facts or circumstances that provide a reasonable basis for the Disclosure.
- 5.4 Personal work-related grievances are those that relate to the Discloser's current or former employment or engagement with the School that might have implications for the Whistleblower personally, but do not:
- (a) Have any other significant implications for the School; or
  - (b) Relate to any Serious Misconduct.
- In these circumstances, the person should refer to the School's internal grievance handling procedures. The School's HR Manager may be contacted for more information.
- 5.5 However, personal work-related grievances may be covered by this Policy where they include information about misconduct, an allegation that the School has breached employment or other laws punishable by imprisonment of a period of 12 months or more, or the grievance includes Detrimental Conduct in response to a Disclosure.
- 5.6 To provide effective protection of Whistleblowers, including allowing continuous discussion with anonymous Whistleblowers, the School has made available two options for Whistleblowers to make a Disclosure. The Disclosure can be made to the **School's Whistleblower Protection Officer** via the confidential email address which is **[whistleblower@bmg.vic.edu.au](mailto:whistleblower@bmg.vic.edu.au)**, or by calling or emailing the external, secure and online service **Integrity Line – telephone number 1800 468 456** or online via **[www.integrityline.com.au](http://www.integrityline.com.au)**.
- 5.7 Integrity Line is an independent service provider with staff who are specifically trained to deal with the types of sensitive issues that are reported through whistleblower systems.
- 5.8 A reference to a disclosure made to the Whistleblower Protection Officer in this policy is a reference to a disclosure made to either the Whistleblower Protection Officer or Integrity Line.
- 5.9 In either case, a Whistleblower Disclosure to the School's Whistleblower Protection Officer or Integrity Line may be provided on an anonymous basis or on the basis that the Whistleblower's identity is disclosed to either the Whistleblower Protection Officer or Integrity Line only and kept confidential from the School. However, the provision of Whistleblowers' identities to the Whistleblower Protection Officer or Integrity Line can assist in any subsequent investigation and allow follow up to seek any clarification or feedback.
- 5.10 For a report to be investigated, it must contain enough information to form a reasonable basis for the investigation. It is important that the Whistleblower is able to provide as much information as possible.

This includes any known details about the events underlying the report such as the:

- Date;
- Time;
- Location;
- Name of the person(s) involved and their roles;
- Possible witnesses to the event; and
- Evidence of the event i.e. documents, emails etc.

In the Whistleblower's report, the Whistleblower may also include any steps already taken to report the matter elsewhere or to resolve the concern.

- 5.11 When the School receives a Disclosure, the School will determine, in conjunction with the Whistleblower Protection Officer and engagement with the independent Whistleblower Investigator, whether the Disclosure falls within the scope of this Policy. The School will also determine whether a formal investigation is required. If a Whistleblower Disclosure is made through the School's Whistleblower service that does not meet the threshold of reportable wrongdoing such as that listed above in this Policy, the matter may alternatively be referred by the Whistleblower Protection Officer to the relevant School department or staff member to manage (for example, the School's HR Manager) if appropriate, and will be recorded as not being a disclosable matter. Protection of anonymity does not apply in the same strictness to disclosures that are not Disclosure matters, however confidentiality will be maintained as appropriate. In these circumstances, the Whistleblower will be advised of any further action to be taken.

## 6 Whistleblower Support and Protection

### 6.1 Supportive Environment

- 6.1.1 The School is committed to providing a supportive environment for any person making a Whistleblower Disclosure and will strive to ensure that every Whistleblower is protected from Detriment as a result of blowing the whistle. This includes protection from dismissal or demotion, any form of reprisal including retaliation, harassment or victimisation.
- 6.1.2 In addition, the Act provides certain protections for Whistleblowers in certain circumstances. These protections are designed to encourage people within companies, or with special connections to companies, to make disclosures of actual or suspected wrongdoing.

### 6.2 Eligibility for Protections under the Act

- 6.2.1 In order to be eligible for the protections available under the Act, the Whistleblower Disclosure must be:
- (a) Made by an eligible Whistleblower;
  - (b) A Disclosable matter; and
  - (c) Made to an Eligible Recipient which includes the School, or to ASIC, APRA or another prescribed Commonwealth authority.
- 6.2.2 The Act also specifically protects 'public interest disclosures' and 'emergency disclosures' in certain circumstances that are made to a journalist or a Member of Parliament following a previous disclosure to ASIC, APRA or another prescribed Commonwealth authority. However, in the case of public interest disclosures, at least 90 days must have passed since the previous disclosure was made. Before making a public interest or an emergency disclosure, it is recommended that the person contact an independent legal adviser. Whistleblowers may still be protected even if the disclosure turns out to be incorrect.
- 6.2.3 Additionally, to qualify for protection under the Act, the Whistleblower must have reasonable grounds to suspect that the information reported concerns Serious Misconduct, or an improper state of affairs or circumstances, in relation to the School.

- 6.2.4 Should a person have any doubt as to whether their Disclosure qualifies for protection under the Act, they should seek independent legal advice before making the disclosure. A disclosure of information that is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in Part 9.4AAA of the Act qualifies for protection.
- 6.3 Anonymity and Confidentiality
- 6.3.1 The School will, as far as reasonably possible, provide to Whistleblowers the ability to make a report anonymously and will take all reasonable steps to reduce the risk that the Whistleblower will be identified as a result of the investigation. However, the School may not be able to undertake any investigation if it is not able to contact the Discloser (e.g. if a Disclosure is made anonymously and the Discloser has not provided a means of contacting them).
- 6.3.2 The School will keep the Discloser's identity confidential by using some or all of the following measures:
- (a) All personal information or reference to the Discloser witnessing an event will be redacted;
  - (b) The Discloser will be referred to in a gender-neutral context;
  - (c) Where possible, the Discloser will be contacted to help identify certain aspects of their Disclosure that could inadvertently identify them; and
  - (d) Disclosures will be handled and investigated by qualified staff.
- 6.3.3 It is a contravention of the Act if a Whistleblower disclosure that qualifies for protection (qualifying disclosure) is made and a person other than the Whistleblower discloses:
- (a) The identity of the Whistleblower, or information that is likely to lead to the identification of the Whistleblower (**the confidential information**);
  - (b) The confidential information is information that the person obtained directly or indirectly because of the qualifying Disclosure; and
  - (c) The disclosure of the identifying information is not authorised.
- 6.3.4 Disclosure of the confidential information is authorised if:
- (a) The Whistleblower consents to its disclosure;
  - (b) The Disclosure is made to ASIC, APRA or the Australian Federal Police;
  - (c) The Disclosure is made by ASIC, APRA or the Australian Federal Police to a Commonwealth authority, or a State or Territory authority, for the purpose of assisting the authority in the performance of its functions or duties; or
  - (d) The Disclosure is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of Whistleblower laws contained in the Act.
- 6.3.5 It is important to note that it is not a contravention of the Act if, whilst the receiver does not disclose the identity of the Whistleblower directly, information that is likely to lead to the Whistleblower being identified is disclosed in the course of investigating the Whistleblower disclosure, in circumstances where all reasonable steps have been taken to reduce the risk that the Whistleblower will be identified.
- 6.3.6 In circumstances where it is established that there has been a breach of confidentiality or protection in respect of the Whistleblower, a Whistleblower may be entitled to seek civil damages for loss damage or injury suffered, even if no criminal prosecution for victimisation has been, can be, or will be brought.
- 6.4 Protection from retaliation, harassment or victimisation
- 6.4.1 The School's commitment to ensuring the highest standards of ethical conduct within the School includes creating and maintaining a 'speak-up culture', where all staff and persons relevantly associated with the School are encouraged to identify issues in the workplace and participate in resolving them. This includes 'speaking up' through our existing internal reporting procedures including the School's Internal Grievance Policy, Complaints Handling Program and Child Protection Program.
- 6.4.2 The School does not tolerate reprisals or adverse action being taken against Whistleblowers for reporting actual or suspected wrongdoing, including when suspicions are not substantiated following a thorough investigation.
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- 6.4.3 The School will take steps to promote awareness to all staff and relevant persons associated with the School of their responsibilities to treat their colleagues and stakeholders with respect, and never to engage in behaviour that is discriminatory or that characterises bullying or harassment. These responsibilities encompass acknowledging that reporting actual or suspected wrongdoing is integral to an ethical culture, and nobody who reports actual or suspected wrongdoing should experience detriment as a result.
- 6.4.4 A Whistleblower who experiences retaliation, harassment or victimisation should immediately report it to the Whistleblower Protection Officer. Any such conduct will be treated seriously, and the perpetrator of the retaliation may be subject to disciplinary action.
- 6.4.5 It is a criminal offence if a person engages in conduct that causes detriment to another person in circumstances where the first person believes or suspects that the second person, or any other person made, may have made, proposes to make, or could make, a Whistleblower Disclosure that qualifies for protection under the Act and the belief or suspicion of the first person is the reason, or part of the reason, for the conduct.

#### 6.5 Protection from Detriment

- 6.5.1 To promote a culture that encourages Whistleblower Disclosures and protects the people who make them, it is the School's Policy that where a Whistleblower has acted in good faith, and the individual involved has not engaged in serious misconduct or illegal activity, the Whistleblower will not be subject to internal disciplinary proceedings that may have otherwise arisen from the matters that are the subject of the Whistleblower Disclosure.

- 6.5.2 **Detriment** experienced by a Whistleblower is a defined term under the Act and includes:

- (a) Dismissal of an employee;
- (b) Injury of an employee in their employment;
- (c) Alteration of an employee's position or duties to their disadvantage;
- (d) Discrimination between an employee and other employees of the same employer;
- (e) Harassment or intimidation of a person;
- (f) Harm or injury to a person, including psychological harm;
- (g) Damage to a person's property;
- (h) Damage to a person's reputation;
- (i) Damage to a person's business or financial position; or
- (j) Any other damage to a person.

Detriment does not include taking reasonable administrative action to protect a Whistleblower from Detriment, such as relocating a Whistleblower who has made a Disclosure about their immediate work area. In these circumstances, the Whistleblower Protection Officer and any other relevant person who has appropriately and confidentially been made aware of this issue will explain the reasons for this action to the Whistleblower.

- 6.5.3 If a Discloser reasonably believes that they have suffered a Detriment as a direct result of making a Disclosure, they can:
- (a) Make a complaint to the Whistleblower Protection Officer, who will investigate the complaint as a separate matter (consideration will be given as to whether the person has suffered Detriment and whether there are other legitimate reasons why the relevant decision was made);
  - (b) Seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO; or
  - (c) Seek compensation and other remedies through the courts.

## 7 Investigating a Whistleblower Disclosure

- 7.1 All Disclosures, other than those that are not qualifying Disclosures, will be investigated by a Whistleblower Investigator who has been appointed by the School. This person is an independent

expert who is appointed to review and investigate Disclosures that are made by a Whistleblower.

- 7.2 The Whistleblower Investigator will be provided reasonable access to independent specialist advice if required and all School Board members, staff members, volunteers and contractors at the School will be required to assist the Whistleblower Investigator in carrying out their investigations to the maximum possible extent.
- 7.3 The Whistleblower Investigator will, as far as reasonably possible, follow best practice in investigations including ensuring that all reports of suspected wrongdoing that amount to non-qualifying Disclosures are investigated in a way that adheres to the principles of objectivity, procedural fairness, confidentiality and natural justice. This includes providing fair treatment to people who have been mentioned in a report of actual or suspected wrongdoing, by informing of the substance of statements that have been made about them and giving them a reasonable opportunity to respond to allegations before any adverse findings are made and before any disciplinary action (if appropriate) is taken. The Whistleblower Protection Officer will act independently of the Whistleblower Investigator and focus on the protection of the Whistleblower during the investigation.
- 7.4 All paper and electronic documents and other materials relating to Disclosures will be stored securely. Access to all information relating to a Disclosure will be limited to those directly involved in managing and investigating the Disclosure. Only a restricted number of people who are directly involved in handling and investigating a Disclosure will be made aware of a Discloser's identity (subject to the Discloser's consent) or information that is likely to lead to the identification of the Discloser.
- 7.5 The School may disclose the identity of the Discloser with the Discloser's consent and to ASIC, APRA, the Australia Federal Police, Victoria Police, its legal advisors or a person or body prescribed by the Act's regulations.
- 7.6 The School may disclose the information contained in a Disclosure with or without the Discloser's consent if the information does not include the Discloser's identity, the School has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information and it is reasonably necessary for investigating the issues raised in the Disclosure.
- 7.7 If a Discloser reasonably believes that there has been a breach of confidentiality, they can:
- (a) Make a complaint to the School, which will investigate the complaint as a separate matter (consideration will be given as to whether it was reasonably necessary for investigating the issues raised in the Disclosure or there are other legitimate reasons why the relevant decision was made);
  - (b) Seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO; or
  - (c) Seek compensation and other remedies through the courts.
- 7.8 Nothing in this Policy prohibits the School from sharing information with the police, law enforcement and regulatory bodies if the School has determined that the Disclosure does not fall within the scope of this Policy and considers it appropriate to do so.

## 8 Provision of feedback to the Whistleblower

- 8.1 If the Whistleblower's identity is known to the Whistleblower Protection Officer or Whistleblower Investigator then, where possible, the School will provide feedback to the Whistleblower during the course of the investigation and will ensure that the Whistleblower will be informed of the outcome of an investigation. The frequency and timeframe of any updates will vary depending on the nature of the Disclosure and investigation. There may be circumstances where it may not be appropriate to provide details of the outcome of the investigation to the Discloser.
- 8.2 If the Discloser is not satisfied with the outcome of the investigation that arose from the Disclosure, they may submit a request for review that outlines the reasons they are dissatisfied with the outcome and the alternative outcome they are seeking. The School may conduct an internal review as to whether the investigation was conducted in accordance with this Policy. However, School is not obliged to reopen an investigation and may conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation. In these circumstances, the Discloser will be advised of the outcome.

## 9 Policy Implementation

- 9.1 To ensure that all School staff are aware of the Policy, the Policy will be included in the induction procedures for all new staff and in the staff handbook. The Policy will be addressed at a relevant staff meeting at least once a year so that staff are made aware of the Policy, and information will be communicated to staff via the School's online communication channels from time to time.
- 9.2 The Policy will also be uploaded to the School website that is available to all School stakeholders for their review and use if required.

## 10 Breaches of the Policy

- 10.1 Any breach of this Policy will also be considered a breach of the Board Code of Conduct and Staff Code of Conduct. A breach or suspected breach of this Policy should be reported to the School Principal.
- 10.2 The consequences of breaching this Policy may include disciplinary action up to and including termination of employment or an engagement.

## 11 Application and Review Date

- 11.1 This Policy was placed into effect by the School on 1 January 2020 and will be reviewed on or before 1 September 2024.

A copy of this Policy including any amendments will be made available on the School's website and staff portal.

## 12 Related Documents

- Board Code of Conduct
- Child Protection Program
- Conflicts of Interest Policy
- Contractor engagement documentation
- Fraud Policy and Investigation Procedure
- Performance Management Misconduct and Disciplinary Action Policy
- School Community Code of Conduct
- Staff Code of Conduct

## 13 Authorisation

<b>Board Document No.</b>	<b>GOV-071</b>	
<b>Board Document Name</b>	<b>Board Whistleblower Policy</b>	
<b>Approval Authority</b>	<b>Chair of the School Board</b>	
<b>Approval Signature</b>	Cathy Jeffkins <b>Chair of the School Board</b> <b>Bacchus Marsh Grammar</b>	
<b>Administrator</b>	<b>Company Secretary</b>	Greg Gough
<b>Approval Date</b>	<b>2 November 2022</b>	
<b>Effective Date</b>	<b>1 January 2020</b>	
<b>Date of Next Review</b>	<b>2 November 2024</b>	To be reviewed every two years

## 14 History

<b>Date</b>	<b>Amendment</b>
<b>1 January 2020</b>	1. New policy
<b>5 August 2020</b>	2. Updates to 'Whistleblower Protection Officer' terminology and whistleblower disclosures
<b>2 November 2022</b>	3. Reviewed with minor changes