

Whistleblower Policy

Effective	July 2024
Review	July 2025
Owner	Principal
Approver	The Sycamore School Governing Body

1 Purpose

The purpose of this policy is to encourage the reporting of corrupt, illegal, or other undesirable conduct at The Sycamore School. It outlines how individuals can appropriately make disclosures about these matters and how The Sycamore School will protect those individuals from detrimental consequences.

2 Applicability

This policy and procedure is to be followed by a person who fills the role with a .

- Staff (all employees (full-time, part-time, permanent, fixed term, casual or relief), apprentices/trainees, host employees, people doing work experience or vocational placement)
- Directors
- Contractors
- Parents/Carers
- Students
- Visitors
- Volunteers
- Others

3 Definitions/Acronyms

Board	Directors of The Sycamore School Governing Body
School	The Sycamore School
Eligible Whistleblower– Who qualifies for protection?	A Whistleblower who is eligible for protection is an individual such as an officer, employee, service provider or associate (or their relative) who is or has been in a relationship with The Sycamore School and who brings a Disclosable Matter to the attention of the school under this policy.
Disclosable Matter– What kind of disclosures can be	A disclosure is eligible for protection if it relates to actual or suspected conduct within The Sycamore School that is:

<p>made under this policy?</p>	<ul style="list-style-type: none"> • misconduct, or an improper state of affairs or circumstances in relation to The Sycamore School • contravention of the Corporations Act 2001 • conduct that represents a danger to the public or the financial system • an offence against any other law of the Commonwealth that is punishable by imprisonment for 12 months or more.
<p>Eligible Recipients – To whom should a disclosure be made?</p>	<p>Disclosures qualify for protection if they are made to eligible recipients. Those belong to the following categories of persons:</p> <ul style="list-style-type: none"> • a senior manager of The Sycamore School • the Whistleblower Investigations Officer of The Sycamore School • an auditor, or a member of an audit team conducting an audit of The Sycamore School. <p>Disclosures made to a legal practitioner for obtaining legal advice or legal representation are also protected.</p> <p>Under exceptional circumstances, the law makes provisions for whistleblowing disclosures to professional journalists and members of parliament. These are called “emergency disclosures” and “public interest disclosures”; however, they require strict adherence to prescribed processes before being made to qualify for protection.</p>
<p>Detriment</p>	<p>This policy seeks to prevent Whistleblowers from Detriment, which includes the following:</p> <ul style="list-style-type: none"> • dismissal of an employee • injury of an employee in his or her employment • alteration of an employee’s position or duties to his or her disadvantage • discrimination between an employee and other employees of the same employer • harassment or intimidation of a person • harm or injury to a person, including psychological harm • damage to a person’s property • damage to a person’s reputation • damage to a person’s business or financial position • any other damage to a person.

4 **Policy**

At The Sycamore School, we strive to maintain a positive working environment of trust and respect where all voices can be heard. Fundamental to this is our commitment to protecting the rights of anyone who reports wrongdoing in good faith.

The Sycamore School is committed to maintaining and promoting high standards of integrity, governance, and ethical behaviour within the organisation by people at all levels, starting with The Sycamore School Board, the Principal and School Leadership Team.

The Sycamore School is committed to operating:

- legally complying with the applicable laws and practices including the Corporations Act 2001 and Australian Standard AS8004 – 2003 Whistleblower Protection Program for Entities,
- properly, in accordance with its policies and procedures
- ethically, in accordance with its values and beliefs.

All employees and associates have a responsibility to help detect, prevent, and report instances of suspicious activity or wrongdoing.

5 **Related Legislation**

Corporations Act 2001

Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)

Australian Standard AS8004-2003 Whistleblower Protection Program for Entities (Repealed)

6 **Related Documents**

Staff Code of Conduct
Staff Handbook
Staff Complaints and Resolution
Complaint Handling
Workplace Bullying Policy
Workplace Discrimination and harassment Policy
Parent and Volunteers Grievances Policy

7 **Procedures**

Whistleblower Investigations Officer

Whistleblower Investigations Officer the Principal (Ronwyn Collier) is appointed as a Whistleblower Investigations Officer and will investigate the substance of the complaint to determine whether there is evidence in support of the matters raised or to refute the report.

The Whistleblower Investigations Officer can be contacted by the following means:

email: rcollier@sycamore.qld.edu.au

phone: 07 3117 0966

in person

anonymously.

Whistleblower Protection Officer

The Company Secretary (Cindy Corrie) is appointed as a Whistleblower Protection Officer and will safeguard the interests of the Whistleblower in terms of this policy and any applicable legislation and standards. The Whistleblower Protection Officer will be readily accessible by all staff and will have direct, unfettered access to independent financial, legal, and operational advisers as required.

The Whistleblower Protection Officer can be contacted by the following means:

email: ccorrie@thesycamorschool.qld.edu.au

phone: 0419 745 794

in person: a meeting request should be made.

The responsibilities of the Whistleblower Protection Officer and Whistleblower Investigations Officer will not reside in the same person. They should operate, and be seen to operate, independently of each other and should act in such a way that they discharge the two quite separate functions independently of each other.

Reporting

The Sycamore School is committed to providing a safe, reliable, and confidential way of reporting any Disclosable Matters.

A report under this Policy can be made if individuals falling into the category of Eligible Whistleblower have reasonable grounds to suspect that Disclosable Matters have taken place.

A report can be made to any of the following persons, noting it may depend on the matter and the person who is the subject of the matter:

- Principal/Deputy Principal
- Whistleblower Investigations Officer
- Board Chair
- Other Eligible Recipients as defined above.

At any stage, a person in the list above can be skipped if that person is the subject of the report or if the Whistleblower has another reason to believe that the person is not likely to deal with the report properly. While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with the Whistleblower about the report.

Investigation

Investigation processes will vary depending on the precise nature of the conduct being investigated.

The purpose of the investigation is to determine whether or not concerns are substantiated, with a view to rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of the Whistleblower and anyone who is the subject of the Disclosable Matter. The investigation will also have proper regard to the principles set out in the Australian Standard AS8004-2003 on Whistleblower Protection Program for Entities.

The Whistleblower will receive feedback regarding the investigation arising from their report, subject to considerations of the privacy of anyone who is the subject of the Disclosable Matter and standard confidentiality requirements.

Protections

At The Sycamore School, a Whistleblower will not be disadvantaged by having made a report. This includes not being disadvantaged by way of dismissal, demotion, any form of harassment, discrimination or current or future bias (see definition of “Detriment” above). This protection extends to the Whistleblower’s colleagues and relatives.

If reprisals are taken or are claimed to have been taken against a Whistleblower, the Whistleblower Protection Officer will investigate the matter and recommend appropriate action be taken. The Whistleblower has a right to make requests through the Whistleblower Protection Officer for positive actions of protection to be taken. The Sycamore School will keep the reporting confidential and secure within the law. It will not disclose the identity of a Whistleblower, nor disclose information that is likely to lead to the identification of the Whistleblower, unless required under law.

Implementation

The Sycamore School will ensure that all its officers and employees are aware of this policy in the following ways:

- On The Sycamore School website.

Families will be required to sign that they have read and understood the policy on enrolment, and that they acknowledge that access to the policy is provided via the website.

Staff will be required to sign that they have read and understood the policy and will be required to repeat this with each version.

Volunteers are required to read the policy during their induction, and sign that they have read and understood the policy and acknowledge that access to the policy is provided via the website.

8 Document History

Version	Description of modification	Modified by	Date
1.3	Update of policy	Ronwyn Collier	July 2024
1.2	Policy review	Sandra Stuckey	Mar 2022
1.1	New policy	Cindy Corrie	Mar 2020