



WHISTLEBLOWER POLICY

Salesian College Sunbury is an inclusive Catholic Faith Community in the spirit of St John Bosco.

- We are a welcoming COMMUNITY that fosters an atmosphere of joy and optimism.
- We strive for engagement in LEARNING for which we are collectively responsible.
- We promote the pursuit of EXCELLENCE in all aspects of life.
- We are inspired by our FAITH to serve others and develop as resilient, thoughtful and caring citizens of the world.

Central to these values is an unequivocal commitment to fostering the dignity, self-esteem and integrity of children and young people and providing them with a safe, supportive and enriching environment to develop spiritually, physically, intellectually, emotionally and socially.

INTRODUCTION

This policy has been put in place to encourage the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving those employed by Salesian College Sunbury (the 'College'). This includes those directly employed by the College, College Board members (the Board), St Mary's College for the Deaf staff, the Salesians of Don Bosco, the Daughters of Mary Help of Christians and clergy members, College Executive members, third party service providers, volunteers and contractors involved in the College environment.

This policy ensures anyone making a report can do so confidentially and without fear of reprisal. It protects employees and those associated with the College who raise concerns regarding any serious wrongdoing and stops intimidation, victimization, disadvantage, harassment or discriminatory treatment.

This policy aligns with our values to ensure that we observe the highest standards of fairness, honesty and integrity in our activities as a school under the teachings of Don Bosco.

SCOPE

This Policy expresses the commitment of the College Board to child safety, legal and ethical behaviours, and to create a child safe school environment.

This Policy will be published on the College's public website and applies to College Board members (the Board), College Executive Members, all teaching and non-teaching staff, St Mary's College for the Deaf staff, the Salesians of Don Bosco, the Daughters of Mary Help of Christians and clergy members, third party service providers, volunteers and contractors involved in the College environment. Hereafter, all staff and onsite workers will be referred to as 'employees' of the College for the purpose of this Policy.

AIMS

This Policy aims to:

- encourage the reporting of wrongdoing that is of legitimate concern.
- provide protection for people who make serious wrongdoing disclosures.
- outline how the College will deal with all reports of serious wrongdoing.
- outline the avenues available to staff to report serious wrongdoing to the College. Whilst it is generally expected that these issues will be raised through the normal channels of line management, reporting by these avenues may be appropriate or necessary in certain situations.
- outline the disclosure processes of reportable matters in respect of suspected wrongdoing as a means of promoting an ethical framework in managing the risk of

suspected unethical, illegal, corrupt and fraudulent fraud behaviour.

MATTERS THAT SHOULD BE REPORTED

Any matter that a person genuinely believes is in breach of the College's policies or the law should be reported in accordance with this Policy.

Reportable matters, or wrongdoing, include any conduct that involves:

- dishonest behaviour;
- fraudulent activity;
- unlawful, corrupt or irregular use of College funds or practices;
- illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- unethical behaviour, including anything that would breach the College's Staff Code of Conduct;
- improper or misleading accounting or financial reporting practices;
- a breach of any legislation relating to the College's operations or activities;
- behaviour that is oppressive, discriminatory or grossly negligent;
- an unsafe work-practice;
- any behaviour that poses a serious risk to the health and safety of any person at the workplace;
- a serious risk to public health, public safety or the environment; or
- any other conduct which may cause loss to the College or be otherwise detrimental to the interests of the College.

EXCLUSIONS

This policy is not designed to manage disagreements or disputes between employees or to oppose legitimate operational and/or strategies decisions and/or actions.

Issues related to human resources and industrial relations are managed under separate mechanisms and policies and are excluded from this Policy.

RESPONSIBILITY TO REPORT

The College relies on its employees to help maintain and grow its culture of honest and ethical behaviour.

The College will not tolerate conduct that should be reported under this Policy. It is therefore expected that any employee who becomes aware of such conduct will make a report.

PROTECTION OF WHISTLEBLOWERS

An employee making a report in good faith in accordance with this Policy (a Whistleblower) will not be discriminated against or disadvantaged in their employment or engagement with the College, even if the report is subsequently determined to be incorrect or not substantiated.

All reasonable steps will be taken to ensure that a Whistleblower will not be subject to any form of victimisation, discrimination, harassment, demotion, dismissal or prejudice, because they have made a report.

Even though a Whistleblower may be implicated in the wrongdoing, they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

However, this Policy will not protect the Whistleblower if they are also involved in or connected to the improper conduct or illegal activities that are being reported. Making a disclosure may not protect the Whistleblower from the consequences flowing from involvement in the wrongdoing itself. An employee's liability for their own conduct is not affected by their report of that conduct under this policy. Active cooperation in the investigation, an admission and remorse may be taken into account when considering disciplinary or other action.

Protection is not available where the disclosure is:

- trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.
- unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. These will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

ANONYMOUS REPORTING

A report can be made anonymously.

Subject to compliance with legal requirements, upon receiving a report the College will only share your identity as the person making a disclosure or information likely to reveal your identity if:

- you consent;
- the concern is reported to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Tax Commissioner or the Australian Federal Police (AFP); or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If the College needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to reduce this risk. Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis. If the Whistleblower wishes to benefit from statutory protections provided to whistleblowers (for example, under the Corporations Act 2001), they may also have to disclose their name. In these instances, the College will continue to ensure that the Whistleblower is protected from retaliation.

REPORTING IN GOOD FAITH

A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing. Therefore, it is very important that those who make a report under this Policy do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct.

The College takes very seriously all reports made under this Policy and it looks particularly unfavourably on any false reports or claims. Disciplinary action may be taken against any employee who makes a report that is not in good faith. A report will not be considered to be made in good faith if it is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances that provide a reasonable basis for the report.

Repeated reports about trivial matters may also be considered not to be made in good faith.

RESPONSIBILITIES

The Salesian College Sunbury Board, with the Executive Team, governs and is responsible for the ultimate decision-making power regarding reports and investigations under this Policy.

Whistleblower Protection Officer ("WPO")

The College has appointed a Whistleblower Protection Officer (WPO) who will safeguard the interests of Employees making reports under this Policy and will ensure the integrity of the reporting mechanism.

Reports under this Policy should be directed to the WPO, who will review the report, and refer any reports that require further investigation to the Whistleblower Investigation Officer.

The WPO reports directly to the Principal. The WPO also has access to independent advisers as and when required. The current WPO is the Human Resources Manager. If no Human Resources Manager is employed or is on leave, the WPO duties will reside with the Deputy Principal - People & Culture.

Whistleblower Investigations Officer ("WIO")

The College has also appointed a Whistleblower Investigations Officer who will carry out or supervise the investigation of reports made under this Policy. The current WIO is the Business Manager.

The WPO and WIO act independently of each other and the responsibilities of these roles do not reside with one person.

REPORTING

Reports made under this Policy should describe the grounds for the report and provide as much detail as possible of all relevant facts and supporting documentation (if any).

Information contained in reports and provided by Whistleblowers in the course of an investigation will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to the College. This applies to all areas except Child Safety, whereby the PROTECT Identifying and Responding to Abuse - Reporting Obligations Policy takes precedence.

Internal Reporting

Employees are encouraged to first discuss the matter informally with their area leader, department manager or human resources in order to determine whether serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions and determine whether the matter comes under this Policy.

Whistleblowers should ensure as far as they are able that their report is factually accurate, complete, based on first-hand knowledge, without material omission and presented in an unbiased fashion. The report should be as detailed as practicable and include (but not be limited to):

- the exact nature of the alleged misconduct believed to have occurred
- when the alleged misconduct took place, if known
- where the alleged misconduct took place, if known
- who was involved in the alleged misconduct
- the names of witnesses who may know information that is relevant to investigating the alleged misconduct

At all times, these discussions will remain confidential.

Where this is not appropriate, or where the person making a report does not feel comfortable making a disclosure, the report can be made to a member of the College Executive Team, to the Principal directly or to the Chair of the Board.

Reports concerning the WPO and WIO

If the report involves the WPO and/or the WIO, this will be directed to the Principal.

External Reporting

A Whistleblower may make a report to the Professional Standards Office at the Salesian Society Incorporated via email to psso@salesians.org.au or phone 03 9377 6061, or external third-party Government authorities.

An external report may be made anonymously, if desired, using any of these methods. However, this may impact the College's ability to investigate the matters reported.

INVESTIGATING A REPORT

Where a report is made in good faith about a matter that comes under this Policy, the WIO will investigate the report. Where the WIO deems necessary, the WIO may use an external investigator to conduct an investigation, either in conjunction with the WIO or independently. Where the WIO deems necessary, the WIO may also use an external expert to assist with an investigation. All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation.

To avoid jeopardizing an investigation, an employee who has made a report under this Policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

INVESTIGATION FEEDBACK

Wherever possible, and assuming that the identity of the person making the report is known, the Whistleblower will be kept informed of the progress and outcomes of the investigation, subject to privacy and confidentiality considerations.

REPORTS TO OTHER BODIES

In certain circumstances an employee may have a legal obligation to make a report to a statutory body or government department. Employees should ensure that they comply with all such reporting requirements. The WPO can advise Employees on these reporting obligations.

BREACH OF THIS POLICY

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

GENERAL

It is a condition of any employment or engagement by the College that all Employees must comply at all times with this Policy. However, this Policy does not form part of any agreement between any person and the College, nor does it constitute terms and conditions of any person's employment or engagement with the College.

REVIEW OF THIS WHISTLEBLOWER POLICY

This policy is approved by the Salesian College Sunbury Board. The Whistleblower Policy will be reviewed every 2 years or earlier if required.

| Document History | Date(s) | Modification Details |
|---|----------------|---|
| Written by: Executive | 26/11/2019 | |
| Approved by: College Board | 26/11/2019 | |
| Post Implementation Review: Executive | 26/11/2020 | Reviewed, reference to Salesian College Sunbury Board updated |
| | 09/03/2023 | Reviewed, no changes |
| | 20/08/2025 | Reviewed, minor changes |
| Next Approval: Executive | 20/08/2027 | |