

## Introduction

The Board of CSV Ltd (the Board) and its schools, Balcombe Grammar School and Casey Grammar School, are committed to high standards of conduct, integrity and accountability. The Board encourages disclosure of serious concerns about observed or suspected improper conduct or practices (Whistleblowing) within the schools, and will foster a safe culture where those with concerns feel safe to speak up about such conduct.

The purpose of this policy is to provide information on processes for reporting and investigation of improper conduct or practices.

## Policy Accessibility

This policy and its procedures must be accessible to all external stakeholders, staff, students and other members of the school communities and shall be made generally available to view on the schools' portal and websites and provided by hardcopy if requested

## Definition

Whistleblowing is raising concerns about any improper conduct or practices (Reportable Conduct) within the operations of the schools, including concerns about conduct that is

- Dishonest
- Fraudulent
- Corrupt
- Illegal
- Unethical
- Unsafe; or
- Any other serious improper conduct.

For the avoidance of doubt, Reportable Conduct does not include any employment or workplace related conflicts, issues or grievances which will be managed in accordance with relevant school policies.

A Whistleblower is a person who raises concerns about Reportable Conduct.

## Reporting Process

In our Schools:

1. A Whistleblower who has any information where he / she has reasonable grounds to suspect misconduct or an improper state of affairs or circumstances should promptly, in person or in writing, report such concerns to the Business Manager or to the relevant School Principal.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to the Business Manager or the relevant School Principal, then he/she has the right to report the matter to the CSV Limited's nominated independent reporting agency, **Integrity Line**.
3. When reporting any concern the Whistleblower may disclose his / her identity or may choose to remain anonymous.
4. The person who receives the reports must act promptly to investigate and/or resolve the issue.
5. Investigations will follow a fair process, be conducted in a timely manner as the circumstances allow and be independent of the person(s) about whom the Allegation has been made. The investigator will provide feedback to the Whistleblower on the progress and expected timeframes of the investigation
6. Procedural fairness will be applied in dealing with any individuals who are the subject of Whistleblowers' reports. Allegations will be provided in writing, individuals will be given an opportunity to respond fully to allegations and may be accompanied by a support person during the investigation processes.
7. The identity of the Whistleblower if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by Police or it is otherwise required by law to disclose such information.
8. Crimes against person or property, should immediately be reported to the Police.

## Reasonable grounds

9. CSV expects that any Whistleblower will only occur where there are reasonable grounds to suspect that the information disclosed is true. No penalties apply where the information is found to be incorrect, however knowingly making a false report is a breach of this policy and the CSV schools' Code of Conduct.

## Anonymity

10. Any person making a Whistleblower report may do so anonymously. Disclosure of identity is encouraged to facilitate addressing the matter, however disclosure is not required. All anonymous Whistleblower reports will be investigated. However there may be some practical limitations to the investigation where the Whistleblower identity is unknown.

## Retaliation prohibited

11. The Whistleblower shall receive no retaliation or retribution (or prohibited detrimental conduct) for a making a report that was based on reasonable grounds. Prohibited detrimental conduct includes
  - Termination of employment
  - Alteration of an employee's position or duties to his or her disadvantage
  - Harassment, bullying or intimidation
  - Personal or financial disadvantage
  - Unlawful discrimination
  - Harm or injury, including psychological harm
  - Damage to reputation or property
  - Or any other conduct that constitutes retaliation.
12. Anyone who retaliates against a Whistleblower will be subject to investigation, underpinned by procedural fairness. Where retaliation is found to have occurred then this may result in disciplinary action, including possible termination of employment (for employees), as well as to possible criminal and civil penalties under the **Federal Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018**.

## Response to Whistleblower

13. Where the Whistleblower's identity is known, the Whistleblower shall, during school term time, receive a written response within five business days of the receipt of the initial report. During school holidays a response will be provided within 10 business days of receipt of the report.
14. Where the Whistleblower's identity is known, CSV Limited will provide support through professional employee assistance services.
15. If the investigation of a report, that was made on reasonable grounds and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the matter to CSV Limited's nominated independent reporting agency, **Integrity Line**.

## Vexatious allegations

16. Where it is found that a person has made malicious or vexatious allegations then CSV will take appropriate disciplinary or legal action.
17. Vexatious allegations are allegations which are misleading, malicious or false, and not based on reasonable grounds.

## Whistleblower Protection Officer (WPO)

18. An individual making allegations under this policy will have access to the assistance of a Whistleblower Protection Officer (WPO). The role of the WPO is to
- Seek to protect the Whistleblower from Detrimental Conduct
  - Assist in maintaining Whistleblower well being
  - Maintaining Whistleblower confidentiality, where relevant, including as required by law
  - Review and consider any complaints of Detrimental Conduct or any concern that the Whistleblower disclosure has not been dealt with in accordance with this policy
  - Escalate any matter the WPO considers appropriate to the Chair of the Remunerations, Nominations and Policy Committee or the Chair of the Board.
19. Whistleblower Protection Officers appointed by CSV include the Business Manager and the Contact Officers at each school.

## External Reporting

20. This policy does not restrict Whistleblower from disclosing Reportable Conduct to a law enforcement body or government agency or regulator.

## Policy implementation and access

Web, notice boards, newsletters, induction processes, staff handbooks

## Policy History

This policy was created on 12 November 2019 and endorsed by the Board on 27 November, 2019.

## Policy Review

This policy will be reviewed every 2 years