

# Whistleblower Policy

For use by Bethel School Community including staff, students, board & association members, parents/caregivers, volunteers and other relevant stakeholders.



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| Purpose       | Policy outlining how to handle Whistleblower disclosures |
| Delegation    | School Board, Principal & Leadership Team                |
| First Written | August 2023  |
| Date Approved | 24 <sup>th</sup> August 2023                             |
| Approved By   | Board Chair on behalf of Governing Body                  |
| Review Cycle  | Annually   |

## Introduction

Bethel Christian School is committed to maintaining a high standard of conduct and ethical behaviour, to best honour God in all our practices. The School promotes a culture of openness and honesty, encouraging all those in the school community to feel comfortable reporting any unethical and illegal behaviour, and suspected or actual misconduct. Any individual who makes a report shall be able to do so without fear of retaliation, intimidation or repercussions.

## Scope

This policy applies to all current and former:

- Board Members and administrators
- Senior Leadership Team
- Permanent, part-time & casual staff (both teaching and non-teaching)
- Volunteers
- Contractors and Suppliers
- Relatives or dependents of any of the above; and
- Any other relevant stakeholder who has a relationship with the school.

## Definitions

**Whistleblower:** an individual who reports suspected or actual concerns that relate to illegal, unethical, or immoral conduct within an organisation.

**Reportable Conduct:** conduct by a person or persons involved with Bethel Christian School that is actually or perceived to be:

- a) dishonest, fraudulent or corrupt
- b) illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property)
- c) unethical or in breach of Bethel Christian School Policies or Codes of Conduct
- d) potentially damaging to Bethel Christian School, an employee or third party, such as unsafe work practices, environmental damage, and health risk
- e) serious improper conduct
- f) in breach of relevant laws, regulations, by-laws
- g) behaviour that may cause financial loss, or damage to reputation of Bethel Christian School

## Reporting Procedure

An individual who wishes to make a report in connection with reportable conduct should do so promptly to the Principal of Bethel Christian School, in person or using details shown:

Principal Bethel Christian School  
Private and Confidential  
20 Bethel Way  
Yakamia WA 6330  
9842 2100  
paul.cousins@bethel.wa.edu.au

If the individual is reluctant to report directly to the Principal, they have the right to report directly, in writing, to the Bethel Christian School Board Chair:

Geoff Metcalf - Bethel Christian School Board Chair

Private and Confidential  
20 Bethel Way  
Yakamia WA 6330  
geoff.metcalf@bethel.wa.edu.au

Where the report involves the Principal, Board Member or Board Chair the report will be forwarded to Bethel Christian School Association (via the secretary) being the moral owner and overseer of Bethel Christian School.

To the Secretary  
Bethel Christian School Association  
Private and Confidential  
20 Bethel Way  
Yakamia WA 6330

It is at the discretion of the Whistleblower whether they choose to report the matter anonymously. All reports made in good faith will be investigated under this policy, however anonymous disclosures are difficult to investigate as they often do not provide sufficient information to adequately complete an investigation. All Whistleblowers are therefore encouraged to provide as much information as possible when making a report.

Reports of a vexatious nature do not fall under this policy and will be subject to the School's normal disciplinary procedures.

## Confidentiality

Bethel Christian School recognises the importance of confidentiality in all matters relating to this policy. The identity of the whistleblower, if known, will remain confidential to all those involved in applying this policy, unless the issue requires investigation by external investigators or the Police. The person making the report will be kept informed of the progress of the investigation as far is allowed by the law.

All reports made under the confidential reporting process must be made in good faith. Abuse of the confidential reporting process will not be tolerated and will be treated as a serious breach of the School's Code of Conduct.

## Investigation procedures

All submissions of reportable conduct will be subject to thorough investigation by the Principal and/or appropriate members of the school governance structure who are able to remain objective, having regard for the nature and circumstances of the reportable conduct.

Where the investigating parties decide the allegations are of a sufficiently serious nature, external investigators will be engaged.

Any information that could lead to the identity of the person who has made a report will not be released to any person who is not involved in the investigation/resolution of the matter.

Best practices will be followed by the investigation team. Investigators are to be fair, reasonable and independent of the person who made the report, and the person who is the subject of the reportable conduct.

The investigation will include the following steps:

1. Full details of the allegations obtained;
2. Person/s against whom allegations are made are informed;
3. Involvement of external parties such as the WA Police will be considered by the Principal or Board Chair as appropriate;
4. Allegations fully investigated;
5. Principal and/or Board Chair decide on action to be taken; and
6. The person making the report will be kept informed of the progress of the investigation.

A complete record of the investigation steps, including correspondence and critical decisions will be maintained and stored in a confidential and secure manner.

If at the completion of the investigation the report is not confirmed, the matter will be closed and no further action will be taken.

If the investigation of a report made in good faith, and investigated by internal personnel, is not to the Whistleblowers satisfaction they have a right to report the matter to the Association:

To the Secretary  
Bethel Christian School Association  
Private and Confidential  
20 Bethel Way  
Yakamia WA 6330

## Protection

The school prohibits any retaliation against reports made in good faith. All persons making a report are assured that, in making a report, they will not be personally disadvantaged by dismissal, demotion, any form of harassment, discrimination or current or future bias.

Any individual who believes they have been subjected to retaliation may appeal to the Chair of the School Board:

Geoff Metcalf - Bethel Christian School Board Chair  
Private and Confidential  
20 Bethel Way  
Yakamia WA 6330  
geoff.metcalf@bethel.wa.edu.au

Alternatively if a Whistleblower feels the School has not provided adequate protection from retaliation they can appeal to ASIC. <https://asic.gov.au/about-asic/contact-us/reporting-misconduct-to-asic/whistleblower-protections/> or seek relevant legal advice.

## Monitoring and Training

The School will monitor and review this policy regularly to assess its effectiveness in encouraging the reporting of reportable conduct, protection of persons making the reports, and investigation of reports.

The School's community will also be educated and kept informed in relation to the policy and the protections and procedures contained therein.

### References:

AISWA Whistleblower Policies and Procedure Guidelines for Schools

Australian Sector and Investments Commission (ASIC) – Whistleblower rights and protections

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections>