



Guildford Grammar School

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Whistleblower Policy

Policy Name: Whistleblower Policy

Adopted by: Guildford Grammar School Council - June 2020

Next Review Date: June 2025

Revised	Details	Endorsed by Council
June 2022	Document Reviewed by Compliance and Risk Manager	26 July 2022
June 2023	Document Reviewed by Compliance and Risk Manager	8 June 2023
July 2024	Document Reviewed by Secretary to Council	22 July 2024

Purpose

Guildford Grammar School is committed to best practice in corporate governance and compliance and observing the highest standards of ethical behaviour, integrity, transparency and accountability in delivering its services.

Whistleblowers play a vital role in helping the School uncover misconduct that might otherwise not be detected, and the Whistleblower Policy provides a safe and secure means for disclosing wrongdoing.

This Whistleblower Policy forms part of the School's broader risk management and corporate governance framework and outlines the School's process for dealing with disclosures by individuals of serious concerns about misconduct or improper practices within the School.

This Policy encourages the disclosure (either openly or anonymously) by staff, suppliers, contractors, students, parents, volunteers, and other key stakeholders within the Guildford Grammar School community, without fear of intimidation or retaliation.

The School encourages early identification and reporting of misconduct that may cause financial or non-financial loss to the School, cause risk to the safety and wellbeing of students, staff, and visitors, cause substantial risk to the environment, or damage the School's reputation.

This Policy is designed to complement other internal resolution, communication, and reporting channels at the School. To assist with determining which policy is best suited to your concern, refer to the following:

- Child Safe Reporting Policy and Procedures
- Code of Conduct
- Concerns, Complaints and Grievance Management Policy
- Staff Equal Opportunity and Harassment Policy
- Staff Grievance Management Policy

Where a matter involves child safety the Child Safe Reporting Policy and Procedures must be followed without delay.

Note that the Deloitte Whistleblower Service does not replace internal reporting mechanisms which are always available and which Guildford Grammar School encourages you to consider using. However, this is an alternative reporting mechanism which is available to you, particularly if you're concerned about anonymity and would not otherwise feel comfortable reporting serious misconduct.

Whistleblower Service

The Guildford Grammar School Deloitte Whistleblower Service is an independent whistleblowing service managed by Deloitte. Guildford Grammar School offers this Service as a channel for reporting serious misconduct in the workplace.

Should you choose to do so, your disclosure can be lodged anonymously. However, it is easier for Guildford Grammar School to protect you and for the matter to be investigated if you do provide your details and authorise Deloitte to pass them on, particularly if Guildford Grammar School needs further information.

Guildford Grammar School takes this reporting channel seriously and commits to review all reports and consider appropriate follow-up action.

How it works

You can contact the Guildford Grammar School Deloitte Whistleblower Service using the dedicated hotline number, website or postal address to report serious misconduct such as breach of law/regulatory requirements, fraud, theft, bribery & corruption, abuse of influence, conflict of interest, policy breach, bullying, harassment, discrimination, work health & safety and any other serious misconduct including unethical behaviour, or any other concerns you feel you cannot raise internally, or which have been reported internally but which you feel have not been resolved appropriately.

This service is anonymous. You will not be required to reveal your identity unless you choose to do so.

How to report

Making a Disclosure by phone

To make a report by telephone, simply dial **1800 325 030** (Toll Free). You will be connected to a Guildford Grammar School Deloitte Whistleblower Service operator from Deloitte who will ask you a series of questions to record details of the misconduct. The operator will then create a report based on the information you have provided.

The service is anonymous. You will not be required to reveal your identity unless you choose to tell the operator. You should provide as much detail as possible to ensure the disclosure can be fully reviewed.

Once the operator has taken your call, the report will go through a review process within the Service Team at Deloitte. By close of business the following business day after a Disclosure is made the report will be provided to Guildford Grammar School who will review the report and consider appropriate follow up action.

Making a Disclosure via the website

You can make a report on the Guildford Grammar School Deloitte Whistleblower Service website: [Guildford Grammar School Deloitte Whistleblower Service \(deloitte-halo.com\)](https://deloitte-halo.com).

To enter a report online, please click "Log a disclosure/suspicion". This will take you to a webform with structured questions. Once you fill in all of the information you have and provide consent for the information to be provided to Guildford Grammar School, you can create a password and will be provided with a case ID so you can log back into the website to check on the status of the report or provide additional information.

Making a Disclosure via post

You can send a letter to:

Guildford Grammar School Deloitte Whistleblower Service
Reply paid 12628 A'Beckett Street
Victoria 8006

Once the Service has received your letter, if you have provided contact details, we will provide you with your case ID and request your consent to provide the information to Guildford Grammar School. We will also confirm whether you provide permission for your name and contact details to be provided confidentially to Guildford Grammar School, or if you want the Service to withhold your identity.

Once the information has been received by the Guildford Grammar School Deloitte Whistleblower Service an experienced Deloitte analyst will review the information you have given. The report will then be provided to a dedicated representative at Guildford Grammar School to consider appropriate follow-up action.

What to report

The type of information to provide when reporting an incidence of serious misconduct should include:

- Names of people involved;
- Names of any witnesses;
- Date, time and location of incident(s);
- Details of any proof;
- Money or assets involved;
- How often the incident has happened;
- Any other information that may assist with reviewing and investigating the disclosure.

Protecting your wellbeing as a Discloser

Guildford Grammar School takes disclosures seriously and seeks to protect disclosers from the risk of any adverse treatment as a result of that disclosure. The School will not tolerate intimidation, retaliation, victimisation, or harassment of individuals making a disclosure in relation to this Whistleblower Policy.

If at any time you feel 'blowing the whistle' has triggered any sort of adverse treatment towards you, please report this immediately and efforts will be made confidentially to stem any mistreatment of you and will be promptly investigated.

To report adverse treatment, you can use the 'add information' tab and disclosure reference number to notify us or lodge a separate disclosure about the mistreatment. Your wellbeing is very important to Guildford Grammar School.

A whistleblower who has not engaged in misconduct or illegal activity will be safeguarded from disciplinary proceedings, detrimental conduct, and victimisation. Protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the *Corporations Act 2001*.

Policy review

This policy will be made available to staff via Policy Connect policy portal and through staff training.

Guildford Grammar School may amend this policy at any time to ensure continuous improvement. The Policy will be subject to review every two years by the School Council, or earlier if there has been a change in legislation.