



Glenaeon Whistleblower Policy and Procedures

September 2023

1. Introduction

Glenaeon Rudolf Steiner School (the "School") is an independent, co-educational school catering for children from Preschool through to Year 12.

Within Glenaeon, recognising the expectations of the Schools staff (all employees), students, regulators and the community, the Board is committed to best practice in corporate governance, compliance and ethical behaviour generally. One of the principal responsibilities of the Board

2.3. Matters

A disclosable matter ("matter") is one where the whistleblower has reasonable grounds to suspect that the information relating to the School concerns the following:

- misconduct;
- an improper state of affairs or circumstances;
- illegal activity (including conduct of officers and employees) – meaning activity in breach of the 2001 or specified financial services legislation, or an offence against any law of the Commonwealth punishable by imprisonment of 12 months or more; or
- conduct (including conduct of officers and employees) that represents a danger to the public or financial system.

This may include any conduct in relation to the operation of the School that involves:

- fraudulent activity;
- negligence;
- unlawful or corrupt use of school funds;
- breach of duty;
- improper accounting or financial reporting practices;
- systemic practices that pose a serious risk to the health and safety of any person on school premises or during school activities.

If a disclosure is not about a disclosable matter, it will not qualify for whistleblower protection under the 2001.

2.4 Disclosure

A qualifying disclosure ("disclosure") is when a whistleblower makes a disclosure to an eligible recipient, and the whistleblower has reasonable grounds to suspect that the information concerns a disclosable matter.

2.5 Anonymous Disclosure

A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. However, this may make it difficult to investigate the reported matter. The School therefore encourages disclosers to provide their names.

If a discloser wishes to disclose anonymously, the discloser should provide sufficient information to allow the matter to be properly investigated. The School encourages the discloser to provide an anonymous email address through which additional questions can be asked and information provided. It will also allow the School to report the progress of the investigation to the discloser, as appropriate.

2.5 Recipients

Under this policy the eligible recipient ("recipient") will be the follow (h)-5.5a0.4 7k224

The Whistleblower Service (WBS)

The WBS is an independent legal and multidisciplinary practice, Integroe Partners. Arrangements have been made by the School for the WBS to assess, investigate and manage all disclosures for the School. The WBS reports directly to the Chair of the School Board. If a disclosure relates to the Chair, then the WBS will engage with the Chair of the School Board's Risk Sub Committee.

The WBS responds and manages all disclosures, and maintains the collection of data on all reported disclosures and the outcome for the School.

2.6 Reasonable grounds to suspect

Whether a person would have 'reasonable grounds to suspect' is based on the reasonableness of the reasons for their suspicion, having regard to all the circumstances when considered objectively.

If a disclosure is made without 'reasonable grounds to suspect', the disclosure will not qualify for the whistleblower protections under the 2011 Freedom of Information Act (54n)ly

7. Staff Awareness and Training

The School will ensure all staff and the School community are informed about the

. Staff involved in receiving a disclosure under this policy will be provided appropriate training in the management of such matters.

- been, taken to address the information in the disclosure; and
- the eligible whistleblower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
- before making the disclosure, the eligible whistleblower gives written notice to the original recipient that includes sufficient information to identify the previous disclosure and states that they intend to make a public interest disclosure; and
- the extent of information disclosed is no greater than necessary to inform the recipient of the disclosable matter.

An eligible whistleblower may wish to consider obtaining independent legal advice before making a public interest disclosure.

Emergency disclosures

An eligible whistleblower can disclose to a member of Parliament or a journalist only if the information has been previously disclosed to ASIC, APRA or a prescribed Commonwealth authority, and:

- the eligible whistleblower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
- before making the disclosure, the eligible whistleblower gives written notice to the original recipient that includes sufficient information to identify the previous disclosure and states that they intend to make an emergency disclosure; and
- the disclosure of information is no greater than necessary to inform the recipient of the substantial and imminent danger.

An eligible whistleblower may wish to consider obtaining independent legal advice before making an emergency disclosure.

9.2 Responding to the disclosure

- The WBS will acknowledge receipt of a disclosure within two business days, assuming the whistleblower can be contacted (including through anonymous channels). The WBS will assess disclosures to determine whether:
 - they fall within the protections offered by this policy; and if it does then: -
 - make arrangements for an investigation.

If the disclosure does not fall under the whistleblower policy, the WBS will inform the whistleblower of this and refer them to the relevant School policy.

- The WBS will inform the Chair of the School Board that a disclosure has been received, and how the WBS will manage the disclosure.
- The WBS will undertake a risk assessment and put in place any support services nee01.4 84 (d)10.4f (d)

9.3 Investigation of a Disclosure

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