Protected Disclosures (Whistleblowing) Policy Statement

The purpose of the Protected Disclosure Policy is to allow Aitken College staff, parents, students, volunteers and members of the College community to report serious concerns about the College operations through appropriate and confidential channels without risk of retaliation, victimisation or harassment in any form. The policy is to ensure that all College operations are conducted ethically and with integrity.

Aitken College is committed to achieving its business objectives. In doing so, all members of the College community must behave responsibly and ethically. As such, the College recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures that reveal corrupt conduct, conduct involving a substantial mismanagement of resources, or that which involves substantial risk to public health and safety or the environment. It is Aitken College policy that all reports of concern can be communicated freely without fear of retaliation.

Scope

This policy applies to and is binding upon all current employees, former employees, spouses, parents, current students, past students, dependants, contractors, volunteers of the College, and to the College Board.

Difference between a Complaints Policy and Protected Disclosure Policy

Complaints Policy refers to concerns about day-to-day activity within the College.

Protected Disclosure Policy refers to a significant concern around business operations of the College, a breach of legislative responsibility, serious misconduct or unlawful activity.

Example: Activity occurring in College operations that they believe in good faith to be illegal, dishonest, unethical, fraudulent, or not in compliance with College policy.

Reports or Disclosures about Child Protection

This policy should be read in conjunction with the Aitken College Child Protection policy. Disclosures or complaints that fall within the Child Protection policy must be dealt with in accordance with that Policy.

Reporting Procedure

A student, parent, staff member, or other current or previous member of the School including their family members who wish to make a report in connection with reportable conduct should contact the Deputy Principal or Principal on 9333 9100 or admin@aitkencollege.edu.au or in writing to 1010 Mickleham Road, Greenvale VIC 3059.

If a serious allegation of misconduct relates to the Principal, a written complaint should be made to the Chair of the College Board. Similarly, if the report is against the Chair of the College Board, the Board will appoint another Board member to assume the investigative and decision-making role.

The College is committed to ensuring the allocated officers are appropriately qualified to this role and readily accessible.

If the reporting person would like to remain anonymous, it is advisable to submit the report in writing. The College has an obligation to protect the identity of an anonymous disclosure and must obtain prior written consent should the College feel the need to reveal the identity.

All reports will be kept confidential and secure. 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.

Initial Response

Upon receipt of a disclosure, the person making the disclosure will receive an acknowledgement detailing the following points:

- Acknowledgement that the concern has been received;
- How the College proposes to deal with the matter;
- An estimate of how long it will take to provide a final response (if known);
- Whether any initial enquiries have been made;
- Whether further enquiries will take place;
- Support available to them should they wish to seek any.

The person making the report will be kept informed of the progress of the investigation.

The investigator may also determine that the concern be best dealt with according to the College Complaints Policy or the Child Protection Policy depending on the nature of the report.

Investigation

The Principal, Deputy Principal or Chair of the Board (as appropriate) will discreetly undertake an investigation. The results of the investigation will be presented before the Chair of the Board who will consult with other Board members to decide on the action to be taken. Where relevant, the concern may be reported immediately to the appropriate law enforcement or professional agency.

Outcome

Suitable action which has been agreed upon by the College Board will be taken. The decision will be made in accordance with the relevant College policy for example, the College Staff Code of Conduct. Additional penalties, processes and/or reporting obligations may also apply under federal, state and local laws.

Following the Chair of the Boards decision, the whistleblower will be notified of the outcome of the College's investigation, in a timely manner. Actions and outcomes may be shared at this time if required.

Inconclusive Outcomes

If a whistleblower makes an allegation with reasonable grounds but it is not confirmed by further inquiry, the matter will be closed and no further action taken.

Safeguarding the Whistleblower

Aitken College will take all reasonable steps to protect a whistleblower from any harm for making the disclosure. The College will not tolerate harassment or victimisation of a whistleblower raising concerns in accordance with this policy. Any employees, volunteers, parents or students who victimise or harass any person as a result of raising a concern in accordance with this policy, may be dealt with under the Aitken College Code of Conduct which could result in disciplinary action, including police intervention in extreme circumstances.

Identity Protection Strategies

- Reference to, or personal information of the discloser will be redacted;

- The discloser will be referred to in a gender-neutral context;
- Disclosures will be handled and investigated by qualified staff;
- All papers and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- Communication and documents relating to the investigation of a disclosure will not be sent to an email address or printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

People may be able to identify the discloser if:

- The discloser has previously mentioned to other people that they are considering making a disclosure:
- The discloser is one of a very small number of people with access to the information; or
- The disclosure related to information that a discloser has previously been told privately and in confidence.

If required, the College provides counselling to staff members via the Employee Assistance Program.

Untrue and Vexatious Allegations

Prior to reporting a suspected breach of any College operations, the whistleblower should have reasonable grounds to suspect misconduct, contravention or an improper state of affairs or circumstances.

If the outcome of the investigation shows that untrue allegations were malicious and/or vexatious or made for personal gain then the College will consider taking appropriate disciplinary action.

Availability

This policy is available for all staff on Policy Connect (Ideagen).

Revision History

Version	Date	Reviewed by (name)	Position/Title	Approved by
1	28/03/2019	Josie Crisara	Principal	
2	08/01/2020	Josie Crisara	Principal	
2.1	29/03/2021	Josie Crisara	Principal	College Board
2.2	29/03/2022	Josie Crisara	Principal	College Board
3	29/03/2023	Josie Crisara	Principal	College Board
3.1	08/03/2024	Josie Crisara	Principal	College Board
3.2	06/03/2025	Josie Crisara	Principal	College Board
3.3	11/03/2026	Josie Crisara	Principal	College Board