

VISION STATEMENT

We strive to create a school that truly equips young people for their engagement with the world and the challenges of this century, by fostering an attitude of learning with purpose and joy.

VALUES

Our core values include Truth, Courage, Moral and Ethical Responsibility and Growth.

RATIONALE

Sophia Mundi Steiner School is committed to a culture of honesty, transparency, and accountability. This policy provides a clear framework for reporting serious concerns about misconduct, improper conduct, or unethical behaviour, and protects individuals who make disclosures in good faith.

AIMS

The purpose of this policy is to establish a procedure to provide whistleblowers with protection, allowing students, parents, staff and others to come forward confidentially and anonymously, to the extent possible under existing laws, and ensuring that they are not victimised or subjected to any form of detrimental action.

OBJECTIVES

The objectives of this Policy are to:

- Encourage the reporting of actual and suspected wrongdoing that may materially damage our reputation and/or cause material financial or non-financial loss to the School,
- Describe clearly the process for making a whistleblower disclosure and the types of matters that should be reported,
- Describe clearly the process for investigating a whistleblower disclosure,
- Outline how the School manages whistleblower disclosures in a way that supports and protects the whistleblower (including protecting their identity and protecting them from reprisals), provides fair treatment to persons named in whistleblower disclosures, facilitates appropriate investigation of whistleblower disclosures and provides for the secure storage of the information provided and gathered.

SCOPE

This policy applies to:

- Current and former employees, contractors, volunteers, officers, Board members
- Suppliers and their employees
- Individuals who are relatives or dependants of the above

WHAT IS REPORTABLE CONDUCT?

A disclosure qualifies for protection under this policy if it relates to suspected:

- Fraud, theft, corruption, bribery, or misuse of School funds
- Dishonest, misleading, or unethical conduct

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- Breaches of legal, regulatory, or contractual obligations
- Serious misconduct or abuse of authority
- Risk to the health or safety of students, staff, or the public
- Environmental damage or gross mismanagement
- Concealment or cover-up of any of the above
- Any other act that would otherwise be considered, by a reasonable person, to be serious improper conduct, or an improper state of affairs, or circumstances.

Wrongdoing would also include a deliberate attempt to conceal any of the actions described above.

DISCLOSURES THAT DO NOT QUALIFY

- Personal grievances (e.g. interpersonal disputes, performance issues), unless they involve victimisation due to whistleblowing or systemic misconduct

REPORTING PROCEDURE

Disclosures can be made confidentially and anonymously to any of the following:

Whistleblower Contact	Contact Details
Principal	principal@sophiamundi.vic.edu.au
Board	board@sophiamundi.vic.edu.au (or individual Board member – preferably the Board Chair - email)
Business Manager	business.manager@sophiamundi.vic.edu.au
Anonymous reports	<p>Anonymous reports can be sent to the school, addressed to either the Principal, Board Chair or Business Manager. Please write Private & Confidential on the envelope.</p> <p>Sophia Mundi Steiner School 1 St Heliers Street, Abbotsford 3067 Victoria</p>

Disclosures should, where possible, include:

- A description of the conduct and individuals involved
- Dates and supporting evidence
- Whether the discloser is comfortable being contacted for further information

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

ANONYMOUS DISCLOSURES

- Whistleblowers may remain anonymous and still qualify for protection.
- Anonymous disclosures will be investigated to the extent practicable.
- The School encourages disclosures to include sufficient detail to allow follow-up. If an unidentifiable email or postal address could be provided, that would aid investigations if needed.

INVESTIGATION PROCEDURES

All reports of reportable conduct will be subject to thorough investigation.

Best practices will be followed by the investigating person/s who will be fair 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:

- **Receipt:** The Whistleblower Contact will acknowledge the disclosure within 5 business days (if contactable).
- **Preliminary Assessment:** The claim will be reviewed to determine whether it qualifies under this policy.
- **Investigation:** If warranted, an impartial investigation will be conducted internally or by an external advisor.
- **Outcome:** Where appropriate, findings will be reported to the Board or relevant authority.
- **Confidential Feedback:** If possible, the discloser will be informed of the outcome (while preserving privacy and legal obligations).

Where the Principal or the Chair decides that the allegations are of a very serious nature, external investigators will be engaged.

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

PROVISION OF FEEDBACK

If the whistleblower's identity is known then, where possible the School will provide feedback to the whistleblower during the course of the investigation and will ensure that the whistleblower will be informed of the outcome of an investigation and in particular:

- If the whistleblower's concern was substantiated, the action that has been taken or will be taken to address the issues
- If the whistleblower's concern was not substantiated, then that no further action will be taken unless further information becomes available

ABUSE OF THE REPORTING PROCESS

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, and may lead to disciplinary action.

Whistleblowers who act in good faith, even if their concerns are unsubstantiated, will not face consequences.

REPORTING AND RECORDKEEPING

All disclosures will be securely documented and retained in accordance with the Records Management Policy

The number and nature of whistleblower disclosures (without identifying details) may be reported to the Board annually

ANONYMITY AND CONFIDENTIALITY

Sophia Mundi Steiner School will, as far as reasonably possible, provide to whistleblowers the ability to make a report anonymously and will take all reasonable steps to reduce the risk that the whistleblower will be identified as a result of the investigation.

Disclosure of the confidential information is authorised if:

- the whistleblower consents to its disclosure;
- the disclosure is made to ASIC, APRA or the Australian Federal Police;
- the disclosure is made by ASIC, APRA or the Australian Federal Police to a Commonwealth authority, or a State or Territory authority, for the purpose of assisting the authority in the performance of its functions or duties or
- the disclosure is made to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of whistleblower laws contained in the Corporations Act.

It is important to note that it is not a contravention of the Corporations Act if, whilst the receiver does not disclose the identity of the whistleblower directly, information that is likely to lead to the whistleblower being identified is disclosed in the course of investigating the whistleblower disclosure, in circumstances where all reasonable steps have been taken to reduce the risk that the whistleblower will be identified.

WHISTLEBLOWER SUPPORT AND PROTECTION

Sophia Mundi Steiner School is committed to providing a supportive environment for any person making a whistleblower disclosure and we will always strive to ensure that every whistleblower is protected from detriment as a result of blowing the whistle. This includes protection from dismissal or demotion, any form of reprisal including retaliation, harassment or victimisation.

In addition, the Corporations Act provides certain protections for whistleblowers in certain circumstances. These protections are designed to encourage people within companies, or with special connections to companies, to make disclosures of actual or suspected wrongdoing.

PROTECTION FROM RETALIATION, HARASSMENT OR VICTIMISATION

Our commitment to ensuring the highest standards of ethical conduct within the School includes creating and maintaining a “speak-up culture”, where all staff are encouraged to identify issues in the workplace and participate in resolving them. This includes “speaking up” through our existing internal reporting procedures including our Internal Grievance Policy, Complaints Handling Program and Child Protection Program.

We do not tolerate reprisals or adverse action being taken against whistleblowers for reporting actual or suspected wrongdoing, including when suspicions are not substantiated following a thorough investigation.

We take steps to promote awareness to all staff of their responsibilities to treat their colleagues and stakeholders with respect, and never to engage in behaviour that is discriminatory or that characterises bullying or harassment. These responsibilities encompass acknowledging that reporting actual or suspected wrongdoing is integral to an ethical culture, and nobody who reports actual or suspected wrongdoing should experience detriment as a result.

If a whistleblower provides their identity when they make a whistleblower disclosure, the person/s assigned to the case will proactively monitor the workplace for signs of retaliation, harassment or victimisation and intervene when necessary.

A whistleblower who experiences retaliation, harassment or victimisation should immediately report it to the person assigned to their case, or to their line manager. Any such conduct will be treated as serious misconduct and the perpetrator of the retaliation will be subject to disciplinary action.

It is a criminal offence if a person engages in conduct that causes detriment to another person in circumstances where the first person believes or suspects that the second person, or any other person made, may have made, proposes to make, or could make, a whistleblower disclosure that qualifies for protection under the Corporations Act and the belief or suspicion of the first person is the reason, or part of the reason, for the conduct.

AWARENESS AND TRAINING

- This policy will be made available to all staff, contractors, and Board members
- New staff and volunteers will be briefed during induction
- The Leadership Team will be trained on how to respond to whistleblower concerns appropriately

RELATED LEGISLATION

Sophia Mundi employees, students, visitors, volunteers and contractors are required to act in accordance with relevant legislation:

- *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019*
- *Education and Training Reform Regulations 2007*
- *Education and Training Regulations 2017*
- *Equal Opportunity Act 1995*
- *Victorian Registration and Qualifications Authority Minimum Standards: mandated registration requirements*
- *Equal Opportunity legislation*
 - a) *Equal Opportunity Act 2010 (Vic)*
 - b) *Disability Discrimination Act 1992*
 - c) *Disability Standards for Education 2005*
- *Privacy Act 1988*
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- *ACNC Governance Standard 5*

RELATED POLICIES

- Code of Conduct
- Complaints and Grievances Policy
- Child Safety Policy

POLICY REVIEW

This policy must be reviewed by the Board of Directors every two years to ensure it is operating effectively. Any recommended changes must be approved by the Board or its delegated subcommittee. The Principal is hereby authorised to make administrative and non-material amendments to this policy provided that any such amendments are notified to the Board or its delegated committee at or before its next meeting.

Contact for Questions

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For further guidance or confidential advice regarding this policy, contact:

Business Manager

business.manager@sophiamundi.vic.edu.au