



# THE COUNCIL OF THE KING'S SCHOOL

## PROTECTED DISCLOSURE POLICY

DOCUMENT TITLE: Protected Disclosure Policy  
DATE APPROVED: March 2021  
REVIEW DATE: November 2022  
RESPONSIBLE: School Executive

### 1. Purpose

- 1.1 The purpose of this policy is to establish a procedure to provide Whistle Blowers with protections, allowing them to report any conduct which may fall under the following definition of reportable conduct and ensure that they are not victimised or subjected to any form of detrimental action due to this disclosure. This Protected Disclosure policy applies to all persons who interact with The King's School (the School), including its employees and their delegates, students, parents and members of the School community involved in School activities.
- 1.2 'Whistleblowing' means the disclosure of information which relates to suspected wrongdoing or dangers outlined below. 'Whistle Blower' means a person who raises a genuine concern in good faith relating to the matters below.
- 1.3 This procedure should be used where a party wishes to raise or report concerns about a person or matter where the following 'Reportable Conduct' has been observed:
- substantial mismanagement of School resources, financial impropriety or fraud;
  - unsafe work practices during a School activity which create a serious risk to health, safety or the environment;
  - criminal offences including theft, drug use or sale, violence or threatened violence;
  - a failure to comply with legal obligations including privacy and information security;
  - serious improper conduct including dishonest or unethical conduct;
  - any other conduct which may cause considerable financial or reputational loss to the School;
  - attempts to conceal any of the above.
- 1.4 This policy should not be used to:
- replace the grievance procedure that should be used to raise personal issues relating to job or employment;
  - replace the mandatory reporting of reportable conduct in relation to Child Protection which is covered in a separate Child Protection Policy and Procedure;
  - question financial or business decisions taken by the School;
  - reconsider any matters which have already been addressed under harassment, grievance, disciplinary or other relevant policies and procedures.
- 1.5 This policy is non-contractual and does not constitute any part of a staff member's terms and conditions of employment. The School reserves the right to review and revise the policy at any time without prior notice or consent.

### 2. Reporting Procedure

- 2.1 If you believe that the School or any member of staff or member of the School community is intending to, has committed or has failed to take action which you reasonably believe will lead, or amount, to the outcomes of wrongdoing listed above as Reportable Conduct then you should follow the procedure below.
- Information should be reported promptly to one of the Whistleblowing Officers or the independent external reporting person whose contact details are below. The report should provide as much detail as possible so that the allegations can be fully investigated. Such reports can be anonymous. The School's Whistleblowing Officers are:



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Director of Finance and Business Operations – 02 9683 8447

Director of Continuous Improvement, Mr David Swinfield – 02 9683 8620 or [dgs@kings.edu.au](mailto:dgs@kings.edu.au)

Both can also be contacted in writing:

Attention: Whistleblowing Officer  
The King's School  
PO Box 1  
Parramatta NSW 2124

Independent Reporting Person Contact Details:

Mr Damien Bailey, Chairman  
Risk, Audit & Compliance Committee  
The King's School  
PO Box 1  
Parramatta NSW 2124

If, for whatever reason, you feel you cannot, or it is inappropriate to, raise your concern with the Whistleblowing Officers, or the external Independent Reporting Person then you should disclose the information to the:

Chairman of Council – Mrs Rosemary Abrahams  
The King's School  
PO Box 1  
Parramatta NSW 2124  
[chairman@kings.edu.au](mailto:chairman@kings.edu.au)

In addition to the Chair of the School Council, Governors will receive reports on allegations made and the status of open cases.

The School's Whistleblowing Officers will investigate all reports including anonymous reports although it is acknowledged that the absence of being able to obtain additional information from the reporter may inhibit the investigation as described below.

### 3. Investigation

- 3.1 All disclosures of Reportable Conduct will be subject to thorough investigation by the School. The relevant Whistleblowing Officer will be fair and independent of the person who made the report (if known) and the person who is the subject of the alleged Reportable Conduct.
- 3.2 The School will promptly investigate allegations and take whatever action it considers appropriate. The investigation will include the following steps (but not necessarily in the order shown):
- obtain all relevant facts and complete details of the circumstances alleged;
  - inform the person against whom allegations are made;
  - conduct the investigation proper which may include interviews with staff members and other parties in order to obtain sufficient evidence. It may also require the involvement of independent external parties and subject matter experts if necessary and appropriate;
  - determine the matter and arrive at a decision and any action to be taken;
  - inform the Whistle Blower of what action has been taken with respect to the disclosure.

### 4. Protected Disclosure

- 4.1 If you reasonably believe that the nature of your concern relates to one of the areas outlined above, and you disclose this information to the appropriate person in good faith, the School will take this into consideration when in normal circumstances action against you by the School is warranted. The School can give no undertaking that it or an external agency will not take action against a wrong doer who has disclosed information in accordance with this Policy.



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4.2 All persons making a report in good faith are assured that in making the report, they will not be personally disadvantaged by dismissal, demotion, any form of harassment, discrimination or adverse action on current or future basis.

### 5. Anonymity

5.1 It is important that these types of issues are dealt with quickly and sensitively. The School does not encourage Whistle Blowers to make disclosures anonymously. A full investigation may be more difficult or impossible if the School cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith.

5.2 However, if you disclose information in accordance with this procedure then your identity will be kept confidential, in so far as is reasonably practical and to the extent possible under existing law. If it is necessary to disclose your identity, or your identity will become apparent through inference, you will be given notice of this by the relevant Officer.

5.3 Concerns about possible reprisals should be discussed with the Whistleblowing Officers and if necessary a welfare manager may be appointed to your case. At all times, complete discretion will apply regarding the number of individuals involved in reviewing the disclosure.

### 6. Abuse of Process

6.1 If you are found to be victimising another member of staff for using this procedure or deterring a member of staff from reporting their concerns under this procedure, you may be subject to disciplinary action which could lead to the termination of your employment. Abuse of the confidential reporting process will not be tolerated and will be treated as a serious breach of the School's reasonable expectation of staff behaviour.

### 7. Monitoring and Training

7.1 The School will monitor and review this policy regularly to assess its effectiveness in encouraging the reporting of Reportable Conduct, protection of persons making reports, and the investigation of reports. The School is committed to ensuring the Whistleblowing Officers are appropriately qualified for this role and readily accessible. Education and training about the procedures involved under this policy will be provided to those involved in managing and investigating disclosures. The School community will be advised of this policy and kept informed of any amendments via the School's website and other means.

### 8. Amendment of Policy

8.1 Following any review of this Policy any proposed amendment will need to be approved by the School Council before it is implemented.

February 2017

Version Table	
Version	Date
1.0	February 2017
2.0	November 2018
3.0	May 2019
4.0	March 2021
5.0	May 2022

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