



WHISTLEBLOWER PROTECTION POLICY

Part A: Whistleblower Protection Policy

Rationale

Because Melton Christian College seeks to follow the teachings of Christ, everyone is to have equal opportunities to safely voice concerns. As a Christian organization, MCC upholds the Bible's teachings about honesty, principled business practice, abiding by the law, respecting appropriate authorities, and giving a voice to everyone regardless of their status. This Whistleblower Protection Policy is intended to contribute to building a College culture that demonstrates sound governance and promotes upright behaviour in the detection, exposure and management of fraudulent, corrupt or improper conduct. Additionally, because Melton Christian College even by its title represents Christ and the Christian faith, members of the school-community are expected to respond to wrongdoing in ways that follow the teachings of Jesus in the Christian Bible.

Purpose

This Policy provides protection to Whistleblowers by establishing a procedure for concerns to be raised confidentially without fear of reprisal.

Policy Statement

- a) MCC will take all reasonable steps to protect the confidentiality of a Whistleblower except where the law requires their identification in legal proceedings. Employees who make a report in good faith and in accordance with this Policy shall be protected as far as reasonably possible against reprisal, dismissal, discrimination or other unfavourable treatment as a result of making the report.
- b) MCC encourages everyone covered by this Policy to disclose any reportable conduct, and is committed to protecting and supporting those persons who do so.
- c) Any person who discloses reportable conduct under this Policy will not be deliberately disadvantaged by having made the report by: dismissal, demotion, any form of harassment, discrimination, or current or future bias.

Scope

- a) People: This policy applies to all MCC employees.
- b) Connection to other MCC Policies: MCC recognises that there are other forms of reportable conduct that ought to be reported to the appropriate authority in each case. Examples include breaches of the Victorian Institute of Teachers Code of Conduct, breaches of the College's Child Safety Policy, and misconduct of a sexual, physical or emotional nature. Therefore, this policy may need to be read in conjunction with other policies such as the Child Safety Policy.

Definitions of Reportable Conduct is conduct by a person or persons connected with an Entity which, in the view of a Whistleblower acting in good faith, is:

- a) Dishonest
- b) Fraudulent
- c) Corrupt
- d) illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property)
- e) in breach of Commonwealth or state legislation or local authority by-laws
- f) unethical (representing a breach of MCC's applicable Codes of Conduct)
- g) other serious improper conduct
- h) an unsafe work practice

- i) representative of gross mismanagement, serious and substantial waste and/or a repeated breach of administrative procedures
- j) any other conduct which may cause financial or non-financial loss to MCC

Part B: Procedures relating to this Policy

Complaints Procedure

- a) Employees who choose to refer suspected instances of Reportable Conduct should do so directly to Senior Management, or the Governing Bodies (College Council or Board of Directors).
- b) However, in instances where a person is not comfortable reporting directly to a person from either of these groups, then the suspected Reportable Conduct should be referred through the College's Whistleblower Protection System which is managed through an externally appointed organization, see end of this document for how to contact. A Whistleblower may remain anonymous, to the extent allowed by the law.

Investigation Procedures

- a) All reports of Reportable Conduct will be subject to a thorough investigation.
- b) The Senior Management and/or the Governing Bodies (College Council and/or Board of Directors) will investigate the report, or may elect to appoint another person to investigate the matter, on the basis that the investigation may require specialized knowledge or skills. The optimal person to investigate will depend on the nature and extent of the allegation(s).
- c) The person against whom the allegations are made will be informed accordingly.
- d) All reports and investigation procedures will be dealt with promptly.

Report Procedures

- a) The person investigating the report will submit a preliminary report to Senior Management and/or the Governing Bodies (College Council and/or Board of Directors) on the outcome of any investigation.
- b) The report will provide
 - i. a summary of the facts of the suspected Reportable Conduct and of the investigation
 - ii. recommendations about whether an accusation is substantiated or unsubstantiated
 - iii. whether the matter should be referred to the police, other disciplinary actions that may be required
 - iv. and if warranted, suggested actions to recover stolen funds or property, and internal control implications.
- c) All recipients are required to respond promptly to the recommendations of the report
- d) A final report is then to be prepared with decisive responsive actions defined. These actions are to be implemented promptly

During the Investigation/Response Process

The Whistleblower will be kept informed of the progress and outcome of the investigation by Senior Management and/or the Governing Bodies (College Council and/or Board of Directors) subject to privacy considerations of individuals involved in the investigation.

Safeguards

- a) Whistleblowers must be able to rely on the protection afforded by this Policy. If a Whistleblower has any concerns regarding victimisation, discrimination or any other unfavourable treatment as a result of a report made under this Policy, they should immediately contact Senior Management and/or the Governing Bodies (College Council and/or Board of Directors).
- b) No action will be taken against a Whistleblower, who in good faith, makes an allegation which is not substantiated by subsequent investigation. However, separate disciplinary action may be taken by MCC against any individual making malicious or vexatious allegations.

Who to Contact

TBC