

1. Policy Statement

Anglican Schools and Education & Care Services (ECS) are committed to applying the highest standards of legal, ethical and moral practice and behaviour; and to nurturing a workplace environment and culture where people can talk openly about any issues of concern and work towards constructive resolution.

As such, this document provides a policy foundation in which the Policy Audience are able to report, without fear of retaliatory action, concerns about any serious instances of Wrongdoing that they believe may be occurring within any area of an Anglican School or ECS.

This reporting is defined as **Whistleblowing**: the deliberate, voluntary disclosure of individual or organisational Wrongdoing by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated Wrongdoing within or by an organisation that is within its ability to control.

Implementation of this Policy is essential to good risk management and corporate governance, as it provides a mechanism for uncovering Wrongdoing that may not otherwise be detected, by requiring the School, ECS and Anglican Schools Commission (ASC) to:

- a. Provide protections for the Policy Audience to disclose Wrongdoing;
- b. Foster a whistleblowing culture, including:
 - i. transparency in how a disclosure of Wrongdoing is managed;
 - ii. encouraging disclosures made in good faith;
 - iii. deter Wrongdoing by increasing the likelihood the behaviour will be reported.

This Policy is intended to apply to disclosures of Wrongdoing which is serious in nature. Generally such disclosures would be regarded as being in the public interest.

2. Guidelines and Procedures

The *Whistleblower Procedures for Anglican Education* is a supporting document, focused on helping Schools, ECS and ASC to operationalise this Policy, and provide definitions and consistency where necessary.

3. Scope

3.1 This Policy and associated Procedures are to be applied where the Corporation of the Synod of the Diocese of Brisbane, also known as the Anglican Church Southern Queensland (ACSQ):

- a. Owns an Anglican School. Where this occurs, this Policy applies to the School and any business the School owns or controls; including for example, unincorporated associations such as P&F, education and care services, sporting clubs, boarding schools and child accommodation services; or
- b. Is the Approved Provider of an Anglican Education & Care Service.

Other Anglican Schools, including those subsidiary to the ACSQ, and other Anglican ECS have specific legislative obligations that vary from the above mentioned systemic schools and services and as such this Policy should not be relied upon to meet those obligations.

3.2 This Policy does not replace any legal, canonical or policy obligations of the Policy Audience, the school or ECS. For example:

- a. conduct expectations described in the Code of Conduct for Anglican Schools and ECS, *Our Commitment: Creating environments for children and young people to thrive*;
- b. responsibilities detailed in student/child protection policy and procedures;
- c. employment related grievances that do not otherwise fall within examples of Wrongdoing described in the Procedures.

4. Accountability and responsibility

Collectively referred to as the “Policy Audience”, this policy applies to:

- a. all employees and former employees,
- b. office holders and former office holders,
- c. clergy (active or retired),
- d. volunteers
- e. contractors and suppliers of the school or ECS ACSQ
- f. currently and formerly enrolled children/students and their parents/guardians, and
- g. spouses and relatives of the above.

This Policy and associated Procedures are approved by the ASC.

All persons engaged by a School or ECS, including both staff and volunteers, are responsible for meeting the Standards described in the Code of Conduct for Anglican Schools and Education & Care Services, *Our Commitment: creating environments for children and young people to thrive*.

School and ECS leadership, including School Councils or ECS Management Committees and the ASC, have a critical responsibility to facilitate the implementation of this Policy at all levels and appreciate that effective implementation requires a whole of School or Service approach.

a) Schools

For Anglican Schools who are owned or controlled by ACSQ, the Diocesan Council is the governing body. Through the ASC, Diocesan Council delegates implementation of this Policy to:

- The Head of each Anglican School. Specifically, the Head of School (Principal) is an Eligible Recipient and is responsible for nominating Whistleblower Protection Officers and implementing this Policy and associated Procedures within their respective School.
- The Chair of School Council as an Eligible Recipient.
- The ASC, who are responsible for providing stewardship and support to implement this Policy. This includes the Executive Director, ASC, as an Eligible Recipient and in their role of providing oversight in the management of matters.

b) Education & Care Services

Where ACSQ is the Approved Provider of the Service, delegation for the implementation of this Policy is made to:

- The Nominated Supervisor/s of the Service. Specifically, a Nominated Supervisor is an Eligible Recipient and is responsible for nominating Whistleblower Protection Officers and implementing this Policy and associated Procedures within their respective ECS.

- The ASC, who are responsible for providing stewardship and support to implement this Policy. This includes the Executive Director, ASC, as an Eligible Recipient and in their role of providing oversight in the management of matters.

5. Review

This Policy will be formally reviewed in three years, or as required on request of either Diocesan Council or the Anglican Schools Commission.

Outside of this, the Anglican Schools Commission will, at a minimum, monitor the Policy for continuing application on a yearly basis, instigating a formal review process if needed.

Operational review requirements by respective Schools and ECS are detailed in the Procedures.

6. Related ACSQ Policy

ACSQ Whistleblower Policy and Procedures (version 1.0, effective 26 March 2020).

7. Version control

Version:	Date:	Document owner:	Comments:
V1.0	18/08/2020	Anglican Schools Commission	Approved