



PLC Whistleblower Policy

Purpose

Presbyterian Ladies' College strives for excellent standards in all areas of its operations and is committed to child safety and wellbeing.

The College encourages the reporting of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving the College and provides protections and procedures so that those who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Policy Application

The protections provided under this Policy apply to an Eligible Whistleblower who reports a Disclosable Matter in relation to the College to a Whistleblower Protection Officer (together, an Eligible Disclosure).

Eligible Whistleblower

An Eligible Whistleblower is a current or former:

- employee, agency employee or contractor of the College;
- supplier of goods or services to the College whether paid or as a volunteer;
- employee from a supplier of goods or services to the College whether paid or as a volunteer;
- member of the College Council or its sub-committees;
- member of the Uniting Church community associated with the College;
- auditor of the College, or
- a relative, dependent or spouse of any of the above eligible individuals.

Disclosable Matter

A Disclosable Matter is information about the College which the Eligible Whistleblower has reasonable grounds to suspect concerns misconduct or an improper state of affairs or circumstances.

That information can be about the College or an employee, Council member or officer engaging in conduct which:

- breaches the Corporations Act;
- breaches other financial sector laws enforced by ASIC or APRA;
- is an offence under any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- represents a danger to the public or the financial system.

Examples of misconduct or an improper state of affairs or circumstances include:

- dishonest, fraudulent or corrupt conduct;
- unethical conduct or a breach of the College's Code of Conduct or its policies;
- serious improper conduct;
- unsafe work practices;
- child abuse (other than child sexual abuse, see below);
- illegal acts including theft, privacy breach, drug sale or use, violence or threatened violence and criminal damage against property;
- breaches of relevant laws or regulations;
- conduct which amounts to an abuse of authority or a conflict of interest,

in connection with the College, or any other conduct which may cause harm or potentially cause harm to any member of the College community, financial loss to the College, damage to its reputation or be otherwise detrimental to the College.

A Disclosable Matter does not generally include personal work-related grievances. These are grievances which relate to a current or former employee's engagement that have implications only for that person and do not have broader implications for the College. Such matters should be reported through the College's Internal Grievance process.

A Disclosure Matter does not include allegations of child sexual abuse. Allegations involving child abuse must be dealt with under the College Child Protection Program and College Code of Conduct. Allegations of child sexual abuse are subject to mandatory reporting obligations. All allegations of child abuse should be referred immediately to the Principal, one of the College's Child Protection Officers or the Chair of Council.

Whistleblower Protection Officers

To qualify for protection under this Policy, an Eligible Whistleblower must report the Disclosable Matter to one of the following Whistleblower Protection Officers:

Ms Cate Begbie (Principal)	+618 9424 6411	cate.begbie@plc.wa.edu.au
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Ms Kristy Denereaz (Director of People and Culture)	+618 9424 6485	kristy.denereaz@plc.wa.edu.au
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If the matter may involve the Principal or the Director of People and Culture then the report should be made direct to the Chair of Council via the confidential email whistleblower@plc.wa.edu.au.

The Principal, Director of People and Culture and the Chair of Council are each designated Whistleblower Protection Officers and only they can receive disclosures that qualify for protection.

How to make a Disclosure

Eligible Disclosures can be lodged confidentially by email anytime to whistleblower@plc.wa.edu.au or by phoning the College Reception during business hours on +618 9424 6444 and asking to speak directly with one of the Whistleblower Protection Officers specified above.

Investigation Procedures

The College will investigate Disclosable Matters reported under this Policy as soon as practicable after receipt of the report. The Whistleblower Protection Officer may, with the reporter's consent, appoint a person to assist in the investigation of a report. Where appropriate, the College will communicate with the reporter regarding the progress of the investigation and/or outcome (subject to consideration of the privacy of those against whom allegations are made and to the extent permitted by law).

Any investigations will be conducted in an objective and fair manner, and as is reasonable and appropriate having regard to the nature of the Disclosable Matter and the circumstances.

Where a report is submitted anonymously, the College will conduct the investigation based on the information provided to it.

Protection and Fair Treatment of Individuals Mentioned in Reports

The College is committed to ensuring confidentiality in respect of all Eligible Disclosures and to the fair treatment of all employees and other individuals who may be mentioned in a report. All reports will be kept confidential and secure. The College will not disclose an Eligible Whistleblower's identity without their consent (unless required to do so by law).

If the College needs to investigate a report, it may be necessary to disclose information that may lead to identification of an Eligible Whistleblower. Disclosures of such information will be made on a strictly confidential basis and the College will take all reasonable steps to reduce the risk of identifying a reporter.

The College will take all reasonable steps to ensure no detriment is caused to an individual who it believes or suspects has made an Eligible Disclosure, where such belief or suspicion is the whole or part of the reason for the actual or threatened detrimental conduct. Detriment includes dismissal, injury, demotion, harassment, discrimination, bias or damage to an individual's property, reputation or business.

Non-eligible Disclosures

Any person wishing to make a disclosure or complaint that does not meet the criteria of an Eligible Disclosure may do so by contacting the Principal or by following the complaints process in the College's Complaints & Grievance Policy available on the College website.

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 and the making of vexatious claims will not be tolerated and will be treated as a serious breach of the College Code of Conduct available on the College website.

Monitoring and Training

The College will review this Policy at least biennially to assess its effectiveness in facilitating the reporting of Eligible Disclosures, protection of those making the reports,

confidential handling of information and the thorough and objective investigation of reports.

Education and training about the procedures involved under this Policy will be provided to those involved in managing or investigating disclosures. The College community will also be educated and kept informed in relation to the Policy and the protections and procedures it contains.

Policy Accessibility

This Policy will be made publicly available on the College website and to staff through the internal staff portal.