Disclosure Policy

1.0 Purpose

The St Michael’s Grammar School (the School) community expects all its members to work together to promote a safe and caring environment that enhances everyone’s well-being and ability to learn and work. Everyone has a right to feel safe and secure and everyone is charged with the responsibility to treat others with dignity and respect, care and compassion.

The School is committed to the safety and wellbeing of all children and young people accessing the School’s services. The School supports the rights of the child and young person and will act without hesitation to ensure a child-safe environment is maintained at all times. The School will also have regard to the cultural needs of those with Aboriginal heritage, those from cultural and/or linguistically diverse backgrounds and particularly vulnerable persons.

This policy describes the School’s commitment to providing a supportive environment for a person wishing to report their concerns of a perceived wrongdoing without fear of retaliatory action or retribution.

2.0 Scope

This policy applies to St Michael’s Grammar School Board members, all staff, volunteers and consultants. It also applies to any person or organisation that has an association with the School who reports serious wrongdoing within or by the School.

3.0 Principles behind this Policy

St Michael’s Grammar School recognises that persons who have a work, service or client relationship with the School are often the first to realise there may be something seriously wrong. However, they may not wish to speak up for fear of appearing disloyal, or may be concerned about being victimised, or subject to other reprisals if they report the matter. No person should be personally disadvantaged for reporting a wrongdoing. Not only is it illegal, but it directly opposes the values of the School.

The School is committed to sustaining an internal culture based on ethical behaviours that are aligned with our School values of Dignity, Respect, Care and Compassion.

It is also committed to providing a supportive environment for the person wishing to discuss or report their concerns without fear of retaliatory action or retribution. When a person makes such disclosure they are entitled to expect that:

- Their identity remains confidential at all times to the extent permitted by law and this is practicable in the circumstances;
- They will be protected from retaliation, harassment and victimisation; and
- Should retaliation occur, it will be treated as serious wrongdoing under this Policy.

This is achieved by:
• Encouraging reporting of wrongdoing issues of legitimate concern  
• Providing safe wrongdoing alternatives to remove inhibitions that may impede such disclosures.

And by establishing procedures that enable:
• Protection for those making serious wrongdoing disclosures  
• Independent internal inquiry/investigation of disclosures made  
• Resolution of the issues(s) identified.

To demonstrate our commitment, this Disclosure Policy provides guidelines for any person or organisation associated with the School who may wish to discuss or report an actual or suspected wrongdoing.

A person considering making a report under this Policy is expected to have reasonable grounds for believing that wrongdoing has occurred and to act in good faith.

4.0 Definitions

<table>
<thead>
<tr>
<th>SMGS or the School</th>
<th>St Michael’s Grammar School</th>
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<tbody>
<tr>
<td>Disclosure</td>
<td>Disclosure is the exposure by or for a witness, of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.</td>
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<td>Wrongdoing</td>
<td>Wrongdoing includes conduct that:</td>
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<td>• is unethical, e.g. dishonesty, altering SMGS records or breaching the School’s Code of Conduct</td>
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<td>• is illegal, fraudulent or corrupt, e.g. theft, drug sale or use, violence or threatened violence and criminal damage against property</td>
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<td>• breaches Commonwealth, State, or Territory legislation</td>
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<td>• is damaging or detrimental to the School’s reputation</td>
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<td>• is seriously harmful to a member of the School’s community, e.g. disregarding their safety.</td>
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5.0 Reporting Procedure

Persons who would like to have a confidential discussion about their concerns or make a formal report about a wrongdoing should contact a Disclosure Officer in the first instance.

6.0 Responsibilities

Any of the following Disclosure Officers can be approached in relation to concerns of wrongdoing:
Disclosure Officer | Responsibilities
---|---
Head of the School | All reports of actual or suspected wrongdoing made under this Policy to a Disclosure Officer will be properly assessed, and if appropriate, independently investigated.
Deputy Head of the School
Director of Business
Any Director of Learning
Child Safety Officer

Where the concern relates to the Head of the School the disclosure should alternatively be made to the Chair of the Finance and Risk Management (FARM) Committee.

The School recognises that a person who has had a report made against them will also need to be supported during the investigation and the School will take reasonable steps to treat the person fairly during this process.