



# **SILVER TREE STEINER SCHOOL**

## Whistleblower Policy

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2026

This policy applies to: staff, Board members and eligible whistleblowers.

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## Policy

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### Purpose

Silver Tree Steiner School (the School) is committed to ethical conduct, transparency and accountability, and encourages those who see wrongdoing to speak up. This policy:

- Encourages reporting of actual or suspected wrongdoing ('disclosable matters')
- Ensures reports are handled appropriately and fairly
- Supports whistleblowers with protection and confidentiality
- Aligns with legislative requirements and sector guidance.

### Scope

This policy applies to eligible whistleblowers. At Silver Tree Steiner Schools, eligible whistleblowers include the following:

- Current and former staff, volunteers, contractors and Board members
- Individuals or organisations who supply goods or services (paid or unpaid)
- Employees of suppliers
- Associates of the school (as defined in the Corporations Act)
- Relatives or dependents (including those of a spouse) of any of the above
- Parent volunteers
- Relatives and dependents of volunteers and their spouses

### Policy Statement

The School:

- Upholds an environment where disclosures of wrongdoing can be made safely
- Treats all disclosures seriously and confidentially
- Protects whistleblowers from retaliation or detriment
- Ensures appropriate action is taken in response to reports

### Legislation

Relevant legislation that underpins whistleblower protections include:

- Corporations Act 2001
- Treasury Laws Amendment
- Taxation Administration Act
- Banking Act 1959 (Cth)
- Insurance Act 1973 (Cth)
- Life Insurance Act 1995 (Cth)
- Superannuation Industry (Supervision) Act 1993 (Cth)

## Definition of Terms

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**Eligible Whistleblower** – An individual to whom the whistleblower protections apply.

**Eligible Recipient** – An individual who can receive a disclosure.

**Disclosable Matter** – Information that a whistleblower has reasonable grounds to suspect, concerning misconduct (including fraud, negligence, default, breach of trust or duty); an improper situation or circumstances; a breach of the Corporations Act or other Commonwealth laws punishable by 12 months or more imprisonment; conduct that represents a danger to the public or financial system.

**Reasonable Grounds** – A whistleblower's suspicion of a disclosable matter must be objectively reasonable, based on facts available to them. The Eligible Recipient does not need to agree with the suspicion.

**Detriment** – demotion, dismissal or disciplinary action; harassment, discrimination or disadvantage; damage to reputation or threats.

**Confidentiality** - the identity of a whistleblower, and any information that is likely to identify them, will be kept strictly private and will not be disclosed without their consent, except where required or permitted by law. Permitted disclosures of identity or identifying information include:

- To ASIC, APRA, or the Australian Federal Police
- To a legal practitioner for the purpose of obtaining legal advice
- To a Commonwealth or State authority if authorized by law
- With the whistleblower's consent
- If reasonable necessary to investigate the matter (provided all reasonable steps are taken to reduce the risk of identification)

**Personal Work-Related Grievance** – A disclosure that relates to the discloser's current or former employment, which has implications for the discloser personally, but does not:

- Have any other significant implications for the school (or another entity)
- Relate to conduct, or alleged conduct, about a disclosable matter

**Public Interest Disclosure** – The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must meet a number of other criteria to qualify.

**Emergency Disclosure** – The disclosure of information to a journalist or parliamentarian, where the discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment.

## Guidelines

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### Protections Available

#### Confidentiality Protections

The School recognises that whistleblowers may want to raise concerns in confidence and will do its utmost to protect the identity of people who raise concern and do not want their name disclosed.

Eligible recipients of the school will not disclose the identity of the eligible whistleblower or information which is likely to lead to their identification. However, there are several exceptions, such as disclosures to:

- ASIC or APRA
- The Federal Police
- A legal practitioner
- Certain State or Commonwealth authorities
- With consent of the whistleblower
- When reasonably necessary to investigate the matter (where possible steps will be taken to reduce the risk of identifying the whistleblower).

Steps the school will take to reduce the risk that the whistleblower will be identified from the information contained in a disclosure:

- All personal information or reference to the discloser witnessing an event will be redacted.
- The discloser will be referred to in a gender-neutral context.
- Where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them.
- Disclosures will be handled and investigated by qualified staff.
- All paper and electronic documents and other materials relating to disclosures will be stored securely.
- Access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure.
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser.

#### No Detriment Protections

To protect whistleblowers from harm, the School may provide:

- Early risk assessments for detriment to the discloser or others
- Access to support services (e.g. counselling)
- Strategies to manage stress or workplace impacts
- Workplace adjustments
- Manager responsibilities to prevent isolation or harassment

If detriment is experienced, whistleblowers should report this immediately to an eligible recipient.

#### Fair Treatment of Others

The School will ensure fair treatment of individuals who are mentioned in a disclosure or are the subject of an investigation by ensuring procedural fairness and providing opportunities to respond to allegations.

## What Can Be Reported? (Disclosable Matters)

A disclosable matter is any information that the whistleblower reasonably suspects shows:

- Fraud or theft
- Dealing in illicit drugs
- Offering or accepting bribes
- Negligence, default or breach of trust
- Causing or threatening detriment to a whistleblower
- Breaches of regulatory requirements or duties
- Offences against Commonwealth laws punishable by 12 months or more imprisonment
- Conduct that poses a danger to the public or financial system
- Serious breaches of employment law with criminal penalties

Disclosures must be about School related matters. Personal complaints that are purely personal work grievances (eg interpersonal conflict without broader implications) are typically handled under the School's *Staff Grievances Policy* or *Concerns and Complaints Policy* unless they also disclose wrongdoing.

A potential whistleblower may seek further information before making a disclosure.

## How to Make a Disclosure

Disclosures may be made to an **Eligible Recipient** in the following ways:

- In writing (preferred)
- Verbally (in person or by phone) clearly stating it is a whistleblower disclosure
- Anonymously

In limited circumstances, a whistleblower may make a qualifying disclosure externally, such as to:

- ASIC or regulated agencies under the Corporations Act
- Legal practitioner (for advice)
- Public interest or emergency disclosures (subject to legal criteria) (refer to **definition of terms**)

If unsure, the School encourages potential Whistleblowers to seek independent legal advice.

## Anonymous Disclosures

Anonymous reports can be made but may limit the School's ability to investigate. Where possible, providing contact details (even confidentially) assists in follow-up support. Suggestions for anonymous disclosures include use of an anonymous email address or post.

## Who to Disclose To

Whistleblower protections only apply if the disclosure is made to an Eligible Recipient. Eligible Recipients at Silver Tree include:

- Head of School
- Members of the Leadership Team
- Chairperson of the Board of Governors

Whistleblowers should report disclosures in writing to the Head of School or a member of the Leadership Team. If a serious allegation of misconduct relates to a member of the school Leadership Team (including the Head of School), a written complaint should be made to the Chairperson of the Board of Governors.

\*see Table 1. Eligible Recipients

Board of Governors	
Chairperson	Cristian Southall <a href="mailto:Cristian.Southall@silvertree.wa.edu.au">Cristian.Southall@silvertree.wa.edu.au</a>
Leadership Team	
Head of School	Anna Brindal <a href="mailto:Anna.Brindal@silvertree.wa.edu.au">Anna.Brindal@silvertree.wa.edu.au</a>
Education Coordinator	Kristy Brookes <a href="mailto:Kristy.Brookes@silvertree.wa.edu.au">Kristy.Brookes@silvertree.wa.edu.au</a>
Business Manager	Kristy Windsor-Turner <a href="mailto:Business.Manager@silvertree.wa.edu.au">Business.Manager@silvertree.wa.edu.au</a>
Operational Coordinator	Donna Bieundurry <a href="mailto:Donna.Bieundurry@silvertree.wa.edu.au">Donna.Bieundurry@silvertree.wa.edu.au</a>

*\*Table 1. Eligible Recipients*

## Investigation Process

Once a disclosure is received:

1. **Acknowledgment:** The School will acknowledge receipt (where contact details are provided).
2. **Assessment:** Determine whether the disclosure qualifies under this policy.
3. **Investigation:** if required, an investigation will be undertaken promptly and fairly.
4. **Updates:** The whistleblower may receive updates, subject to confidentiality and legal constraints.
5. **Outcome:** Findings and actions (where appropriate) will be documented.

## False or Malicious Disclosures

A disclosure made in good-faith that turns out to be unsubstantiated will not result in action against the Whistleblower. However, deliberately false or malicious reports may lead to disciplinary action being taken by the School.

## Breaches of Policy

Penalties apply for breaching a whistleblower’s confidentiality and causing (or threatening to cause) detriment to the whistleblower. See *Whistleblower Protections* for more information.

Disciplinary action will also apply to school employees, board members, contractors and volunteers as laid out in the school’s code of conduct documents and other policies as applicable.

## Policy Dissemination and Review

The Whistleblower Policy will be available to staff, Board members, contractors and volunteers on the School’s external website, on the staff Intranet and in hard copy in the Office. It will be reviewed at least every 2 years, or earlier if required by legislation or procedural changes.