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| <b>Policy Name</b>                         | <b>Code of Conduct - Staff</b>  |
| <b>Policy Document No.</b>                 | <b>STA-001.4</b>  |
| <b>Head of Policy</b>                      | College Principal   |
| <b>Management Responsibility</b>           | Head of High School<br>Head of Primary School<br>Director of Early Learning and Development   |
| <b>Attention</b>                           | College Staff   |
| <b>Policy revision at last Review date</b> | <input type="checkbox"/> No amendments<br><input checked="" type="checkbox"/> Minor amendments<br><input type="checkbox"/> Significant amendments<br><input type="checkbox"/> Full review |

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| <b>Last Date Board Endorsed</b>  | 28 January 2021 |
| <b>Date Policy to be Updated</b> | January 2022    |

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| <b>Related Legislation</b> includes | <ul style="list-style-type: none"><li>• <i>Child Protection (Working with Children) Act 2012 (NSW);</i></li><li>• <i>Children and Young Persons (Care and Protection) Act 1998 (NSW);</i></li><li>• <i>Civil Liability Act 2002 (NSW);</i></li><li>• <i>Copyright Act 1989 (Cth);</i></li><li>• <i>Crimes Amendment (School Protection Act) 2002;</i></li><li>• <i>Disability Discrimination Act 1992 (Cth);</i></li><li>• <i>Education Act 1990 No 8 (NSW);</i></li><li>• <i>Enhancing Online Safety for Children Act 2014 (Cth);</i></li><li>• <i>Health Records and Information Privacy Act 2002;</i></li><li>• <i>Privacy Act 1988 (Cth);</i></li><li>• <i>Privacy and Personal Information Protection Act 1998 (NSW);</i></li><li>• <i>Ombudsman Act 1974 (NSW);</i></li><li>• <i>Teacher Accreditation Act 2004 (NSW); and Teacher Accreditation Regulation 2010 (NSW).</i></li><li>• <i>Work Health and Safety Act 2011 (NSW);</i></li></ul> |
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| <b>Related College Policies</b> | <ul style="list-style-type: none"><li>• Anti-Bullying Policies &amp; Procedures (Years K-2, 3-6 and 7-12)</li><li>• Attendance Policy</li><li>• Behaviour Management Policy &amp; Procedures</li><li>• Child Protection Policy &amp; Procedures</li><li>• Child Safety and Wellbeing Policy</li><li>• Code of Conduct - Parents and Staff</li><li>• Complaints and Grievances Policy &amp; Procedures</li><li>• ELC Policies for ELC Staff</li><li>• Inclusion Policy</li><li>• Risk Management Policy</li><li>• Staff Guidelines for Resolving Complaints</li><li>• Teacher Accreditation Authority Policy</li><li>• Work Health &amp; Safety Policy</li><li>• Whistleblower Policy</li></ul> |
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| <b>Endorsed By</b> | Board of Directors  |
| <b>Access</b>      | <input type="checkbox"/> College Intranet (Staff & Parents)<br><input checked="" type="checkbox"/> Staff Intranet only<br><input type="checkbox"/> Restricted - Board and/or College Executive<br><input type="checkbox"/> Restricted - Staff |



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## STAFF CODE OF CONDUCT

### 1. INTRODUCTION

This Code of Conduct (**Code**) outlines the standards of behaviour expected of every member of staff employed by Moriah College.

This Code is not meant to be exhaustive. It does not attempt to provide a detailed list of expected behaviours. Rather, the Code is intended as a guide to assist members of staff, by setting out expected standards of behaviour, in promoting a safe and caring community and effective learning environment.

This Code supports and reinforces the College's mission - to achieve excellent academic standards by promoting the intellectual, spiritual, moral, social and physical development of students underpinned by Jewish values. Moriah strives to foster critical thought, cultural engagement, tolerance, social responsibility and self-discipline. The total development of all our students remains our overall concern – helping them to proudly realise their full potential as Australian Jews.

This Code also supports and reinforces the College's Ethos (set out in 4.1 below) and its Core Values - commitment (mechuyavut), responsibility (achrayut), respect (kavod) integrity (yoshra) and kindness (chesed).

Every member of staff must conduct themselves both personally and professionally having regard to the College's Ethos and the need to maintain the College's reputation.

Every member of staff is expected to take responsibility for their own conduct and to work with colleagues, students and parents co-operatively to achieve a consultative and collaborative workplace.

All Staff as defined below, are responsible for the safety and wellbeing of students at the College and are expected to act in accordance with this Code in their physical and online interactions with students at the College.

This Code will be made available to every member of Staff. The Code applies to all Staff at the College.

Where there is any conflict between this Code and the Related Legislation listed on page 1, the legislation prevails.

This Code is not intended to be contractual in nature and does not impose any contractual obligations on the College or its Staff. However, it may be the subject of directions with which members of Staff must comply. The College reserves the right, at its sole discretion, to amend or terminate this Code at any time.

Nothing in this Code should be taken to limit the circumstances in which the College may take disciplinary action against or terminate the engagement of a Staff member.



## 2. DEFINITIONS

**'benefit'** – means a non-tangible item of value (e.g. a new job or promotion, preferential treatment or access to confidential information etc.) that one person or organisation confers on another.

**'bribe'** - means the offering, giving, receiving, soliciting or accepting of any item of value by one person or entity to or from another person or entity with the intention of influencing the actions of either person or entity to act in a particular way.

**'Bullying'** - means repeated, unreasonable behaviour that causes (or risks) a person suffering physical or psychological harm. The types of harm that bullying can cause include feeling distressed, intimidated, humiliated, threatened or vulnerable.

**'childsafe community'** – means an organisation that has a culture of reducing the likelihood of harm to children and young people.

**'College'** – comprises the following entities:

- Moriah War Memorial College Association [ABN 98 077 604 961];
- The Moriah War Memorial Jewish College Association Limited [ABN 87 003 214 560];
- Kehillat Moriah Incorporated [ABN 16 284 221 251]; and
- Moriah College Parents' & Friends' Association [ABN 55 169 539 714]

**'College Community'** – means the Staff, the College's students and their parents.

**'Duty of Care'** – means the responsibility of those staff members, employed within a position of trust, to provide students with adequate levels of protection against harm and to safeguard their welfare at all times. The standard of care expected from schools is, understandably, very high.

**'gift'** - means an item of value (eg cash, gift voucher, entertainment, hospitality, travel, commodity, property), which one person or organisation gives to another. In the College's context, a gift or benefit is one which has the potential to compromise the position of a member of staff by either creating an expectation of, or a sense of obligation to, undermine that member of staff's impartiality; and is not one given merely in appreciation of the work of the staff member.

**'harm'** - means any significant detrimental effect to a person's physical, psychological or emotional wellbeing by any cause, and includes minor harm that is cumulative in nature and which would result in a significant detrimental effect of a nature to that person if allowed to continue. Harm can be caused by:

- physical, psychological or emotional abuse or neglect;
- sexual abuse or exploitation;
- domestic or family violence;
- bullying; or,
- one's own actions.

**'lawful direction'** - means a direction which is reasonable, given to a Staff member which is within the scope of their contract and the nature of the work they are employed to perform.

**'parents'** include parents, step-parents, guardians, carers and any others with parental responsibilities for students at the College.



**'professional boundaries'** – means the boundary which delineates appropriate conduct and relationships from inappropriate conduct and relationships, between Teaching Staff and students having regard to the unique position of trust, care, responsibility, authority and influence that Teaching Staff enjoy (see Section 4.5 and 4.6 below for elaboration).

**'Staff'** – includes all of the College's employees, contractors, volunteers, coaches and peripatetic staff, whether or not they are employed or engaged to work directly with children, but does not include contractors who do not work directly with students.

**'Teaching Staff'** – means any member of Staff who works directly with children, as well as anyone who is engaged to provide teaching services to students at the College and includes volunteers and work experience participants.

### **3. GENERAL BEHAVIOURAL EXPECTATIONS OF STAFF**

Teaching Staff are expected to:

- perform their duties to the best of their ability and be accountable for their performance;
- follow reasonable instructions given by their supervisors;
- comply with any lawful direction;
- carry out duties in a professional, competent and conscientious manner while seeking opportunities to improve knowledge and skills, including through participation in relevant professional development;
- act honestly and in good faith in providing service that is honest, impartial and comprehensive;
- be courteous and responsive in dealing with colleagues, students, parents, guardians and members of the College community;
- work collaboratively with colleagues; and
- ensure that conduct, is respectful consistent with the College's Ethos and does not damage the reputation of the College.

### **4. SPECIFIC BEHAVIOURAL EXPECTATIONS FOR STAFF**

#### **4.1 Be aware of, understand and act consistently with the College Ethos and Core Values**

##### **The College Ethos**

Moriah College is a Jewish Day School that espouses a Modern Orthodox Zionist Jewish philosophy or Jewish ethos. The College's Core Values are: commitment (*mechuyavut*); responsibility (*achrayut*); respect (*kavod*); integrity (*yoshra*); and kindness (*chesed*).



The College Ethos, how it is applied and the College's Core Values, are found at **Annexure A**.

**4.2** Be aware of, understand and comply with the College's policies and procedures as well as any information published by the College

The College publishes policies and procedures to guide Staff, students and parents in relation to the operation and function of the College. The College also regularly publishes information about the College which supplements the policies and procedures.

Teaching Staff are expected to demonstrate behaviours that comply with every College policy and procedure.

Teaching Staff are expected to demonstrate behaviours that comply with any notifications published on eLY; any material published in staff newsletters; any material published for Staff briefings and meetings, as well as any material published on Duty Rosters and College Calendars.

Staff who are uncertain about the scope or content of the College's Ethos or Core Values; policies and procedures; or information published by the College, should seek clarification from any of the following relevant Executive members:

- Head of School;
- Director of Early Learning and Development;
- Head of Jewish Life and Learning;
- College Rabbi; and/or,
- Vice Principal.

**4.3** Staff are expected to have considerate and respectful relationships with colleagues, students and parents

The College is committed to a workplace that values dignity and respect. This commitment is consistent with the College Ethos and Core Values. Bullying, rude or insulting behaviour, including verbal and non-verbal aggression, abusive, threatening, intimidating or derogatory language and physical abuse or intimidation towards others is unacceptable.

Note:

1. All students need to feel safe and have their opinions and concerns listened to by Staff with respect.
2. Teaching Staff need to be cognisant of the individual needs of students.

Teaching Staff are expected to demonstrate collegiality and professional integrity.

**4.3.1** In relation to colleagues, Teaching Staff are expected to:

- be approachable, courteous and prompt in dealing with colleagues, students, and parents;
- use appropriate forums for constructive debate on professional matters, sharing expertise and knowledge, valuing the input of their colleagues and treating each other with courtesy and respect;



- uphold the professional standing of their colleagues, providing support for each other, particularly those new to the profession;
- participate in the collaborative review and refinement of policies and teaching programs and/or administrative procedures or processes, respecting different approaches;
- share (non-confidential) information with colleagues relating to the wellbeing of students;
- support activities aligned with the strategic intent of the College;
- demonstrate respect for religious difference and observance;
- tolerate different opinions and perspectives, and resolving disagreements by rational discussion (i.e. open communication and the freedom to voice another point of view); and
- respect the College's Ethos, deferring to the College Principal, College Rabbi or the Head of Jewish Life and Learning on matters pertaining to religious observance, where appropriate.

#### 4.3.2 In relation to parents, Teaching Staff are expected to:

- communicate and consult with parents in a timely, empathetic and sensitive manner, giving due consideration to parental perspectives when making decisions that will have an impact on the education or wellbeing of their son(s) and/or daughter(s);
- refrain from speaking of and/or writing about children of other parents during interviews with parents or other third parties;
- take appropriate action when responding to parental concerns in the following manner:
  - keep email communication with parents brief, and limit communication to factual information that needs to be communicated in a timely manner, with more serious or ongoing student concerns ideally being raised and dealt with over the telephone or in a formal meeting;
  - email communication should not be used to debate matters with parents or to discuss sensitive issues or matters of conflict;
  - in the High School, copy Heads of Year (HOY) or Heads of Department (HOD) on emails as appropriate (i.e. HOH for matters that are wellbeing related; HOD for subject specific concerns). In the Primary School, keep the Year Co-ordinator abreast of parental concerns/issues. In the ELC copy the Director of Early Learning and Development, as appropriate;
  - avoid teaching or being involved in educational decisions involving family members or close friends wherever practical (see below).
  - where it is not practical to avoid such situations completely, another member of the Teaching Staff should make any significant decisions relating to student assessments and have these endorsed by a supervisor; and
  - recognise that students and Staff come from a diverse range of cultural contexts and religious observance and seek to work collaboratively with students' families within those contexts.

#### 4.3.3 Staff are expected not to discriminate against or harass including bullying (as defined), colleagues, or students, or parents on the basis of sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment, sexual orientation or gender identity. Such harassment or discrimination may constitute an offence under the *Anti-Discrimination Act 1977 (NSW)*. In addition, members of staff must not harass or discriminate on the grounds of political or religious conviction.



#### 4.3.4 Complaints by or about Staff

Complaints by Staff in respect of Student or Parents are dealt with under the College's Complaints and Grievance Policy.

Complaints by Staff in respect of other Staff are dealt with under the "Staff Guidelines for Resolving Complaints"

Staff are expected not to make unfounded complaints with malicious, frivolous or vexatious intent, against another colleague, students or parents.

#### 4.3.5 Staff are important advocates for the College and should remain mindful of the significant role they play in upholding its reputation.

Any Staff member who believes that they or anyone else in the College, is being treated in a discriminatory or harassing manner, is expected to report the behaviour to their relevant Head of School (**HOS**).

#### **Act as a role model for students**

*Teaching Staff have a special responsibility to present themselves as appropriate role models (dugma ishit). Modelling effective leadership and working to create an environment which promotes mutual respect is important in establishing a positive educational climate.*

Teaching Staff are expected to:

- involve themselves in the life of the College, participating in and contributing to both academic and co-curricular programs and activities;
- demonstrate their commitment to student learning through detailed knowledge of their students and their respect for individual differences; and
- set high expectations for every student and differentiate their practice, making reasonable adjustments as required.

#### **4.4 Maintain clear professional boundaries with their students**

*As a Jewish community College it is understandable that members of Staff may have familial and close social connections with many students and their families. In this context, members of Staff are expected to be diligent and careful in maintaining clear professional boundaries with their students. By professional boundaries we do not mean to convey that relationships should be cold and detached. However, it is important to separate the personal relationships and the work relationships.*

Every member of Staff is expected to have read the 'Child Protection Policy' and abide by the definition of "Professional Boundaries". They must also refrain from developing a 'personal' rather than a professional interest in a student. An overly familiar relationship raises serious questions of conflict of interest, trust, confidence, dependency and of equality of treatment. Such relationships may have a negative impact on the teaching and learning environment for other students and colleagues and may carry a serious reputational risk for the College.



Wherever practical, Teaching Staff should avoid teaching or being involved in educational decisions involving family members or close friends. Where it is not practical to avoid such situations completely, another member of staff should make any significant decisions relating to the student's assessments and have those endorsed by a supervisor.

**Teach and assess student work objectively and professionally.**

A professional relationship may be compromised if a Staff member speaks disparagingly in the community about students, other teachers and/or College matters or, if a staff member invites a student or students to their home without obtaining permission from their respective supervisor, particularly if no other adult is present. Remaining in role at all times minimises the likelihood of false or unfounded allegation.

**Professional Boundaries.**

Staff must not be alone with a pupil outside a Staff member's area of responsibility, without the prior agreement of a senior Staff leader.

Staff must not enter changerooms or toilets assigned to pupils when supervision is not required or appropriate.

Non verbal communication can also have a huge impact on pupils and colleagues. Take care with body language, eye contact and facial expressions.

Staff must not collude with students. Be conscious that children and young people can draw adults into conversations and situations that cross professional boundaries.

Where Staff attend parties or socialise with students at celebrations (*smachot*), *Shabbat* and festivals (*chaggim*), they should exercise particular care.

Staff must not have a romantic or sexual relationship with a student. Staff are reminded that sexual relations with a person under the age of consent (16 years) or sexual relations between a teacher, and a student under the age of 18 years, are prohibited by Law. It is irrelevant whether the relationship is consensual or non-consensual, or condoned by parents or caregivers.

Staff must not use inappropriate language with students. Sexual innuendo, humiliation, profanity, suggestive humour, banter or vilification or other inappropriate language is unacceptable.

Staff must- report to the Head of School as soon as is practicable, any situation where a student is being overly familiar or appears to be seeking to establish a personal relationship with a member of Staff.

**4.5      Avoid physical contact with students**

*Direct physical contact with students should generally be avoided, both in order to ensure that there is no appearance of impropriety and also as a matter of sensitivity to touch (*shmirat negia*) and modesty (*tzniut*), consistent with the College Ethos.*



All Staff are to respect the personal space and privacy of all pupils and other staff.

Teaching Staff must ensure that where physical contact with a student is required when congratulating, comforting or conveying professional care, the contact does not convey any impression of personal intimacy, or student or gender, preference.

Teaching Staff must ensure that where physical contact with a student is a necessary part of the teaching/learning experience, the contact is appropriate and acceptable to the student. Teaching Staff for example, should seek volunteers to demonstrate a particular physical activity or skill in PDHPE classes that would reasonably require them to interact physically with a student.

Teaching Staff must not under any circumstances, impose physical punishment, or endorse the use of physical punishment on a student.

If a student is injured or ill and needs to be assessed, Teaching Staff assessing the student are expected to advise the student as to what they intend doing and where practicable, to seek the student's consent before acting.

If a member of the Teaching Staff is forced to restrain a student to prevent harm to him/herself or others, this should be documented immediately after the event and (when applicable), should be consistent with strategies outlined in individual student management plans.

Relevant members of Teaching Staff are expected to attend to the toileting needs of young children/those with disabilities, with sensitivity and caution. It may be appropriate for the door to be open. Where practicable, it is desirable that Teaching Staff of the same gender assist young children in toileting when needed. For students with a disability, the management of toileting needs should be included in the student's individual management plan.

In the ELC contact is regulated by policies and procedures readily available at each ELC and on the ELC portal (Educa).

#### **4.6 Share responsibility and commitment to maintaining a healthy and safe workplace.**

*The College has an obligation to take all reasonable steps to protect students from risks of harm that can be reasonably predicted. The duty of care applies during all activities and functions conducted or arranged by the College where students are in the care of the College, regardless of where the activity takes place. The risks associated with any activity need to be assessed and managed before the activity is undertaken. The standard of care required, needs to be commensurate with the students' maturity and ability.*

The duty of care encompasses a wide range of matters, including (but not limited to):

- providing adequate supervision;
- ensuring grounds, premises and equipment are safe for students' use;
- implementing strategies to prevent bullying from occurring; and



- providing medical assistance (if competent to do so), or seeking assistance from a medically trained person to aid a student who is injured or becomes unwell while at College or a College based activity.

Every member of Staff is expected to comply with relevant Work, Health and Safety (WHS) legislation to take care of their own health and safety at work and to ensure that their activities do not place the health and safety of co-workers, students or others at risk. Considerations of safety relate to both physical and psychological wellbeing.

Teaching Staff are expected to be familiar with and understand, the College's Risk Management Policy, relating to all off campus College activities. A risk assessment must be completed for all 'variations to routine' activities.

Staff are expected to be familiar with and understand his/her assigned role as part of the College's emergency procedures. Staff need to treat all emergency drills seriously and insist that all students comply with emergency procedures/drills when required.

Staff are expected to report any work related injury, accident or near miss, to their nominated supervisor.

#### **4.7 Refrain from using tobacco, alcohol, and/or prohibited substances in the workplace.**

*The College is committed to providing a productive, safe and healthy workplace and one that is free from tobacco, alcohol (other than at particular social functions on campus) and/or prohibited substances. Maintaining such an environment requires continuous cooperation from all members of Staff, students, parents/guardians and the College community.*

Staff are expected to be responsible for ensuring that their capacity to perform their duties is not impaired by the use of alcohol and/or prohibited substances and that the use of such substances does not put at risk, the member of Staff's or any other person's health and safety.

Staff must not:

- attend work under the influence of alcohol and/or prohibited substances;
- endanger their own health or safety or that of any other colleague by the use of tobacco, alcohol (other than at particular social functions on campus) and/or prohibited substances during College hours or at any College function, including events conducted outside College premises, unless expressly permitted to do so by the College Principal. Any illegal drugs found in the possession of any Staff member on College property will be reported to the Police;
- purchase tobacco, alcohol and/or prohibited substances for any student of the College;
- condone or encourage the use of tobacco, and/or prohibited substances or the excessive consumption of alcohol; or
- supply or administer prescription or non-prescription drugs to students or children and young people unless following the directions set down in the College's policy concerning the administration of medication.



Every member of Staff is expected to notify their supervisor if they are aware that their work performance or conduct could be adversely affected as a result of the effects (including side effects), of a prescribed drug.

Every member of Staff is expected to take action to resolve any alcohol or other drug related problems that they have.

Every member of Staff is expected to immediately notify their supervisor if concerned about working with other colleagues who may be affected by drugs or alcohol.

**4.8 Use electronic communication and social networking sites in an appropriate manner.**

*The College provides electronic communication facilities for its Staff and students for educational or administrative purposes. The College monitors and views data stored or transmitted using the College's facilities. By its nature, electronic communication is a fast and informal way of communicating. However, once a document or image has been sent there is no way to recall it, and it exists forever.*

Every member of Staff is expected to comply with the College's ICT Acceptable Use and Social Networking Policy, including, by:

- exercising good judgment when using email or social media, following the principles of ethical behaviour and ensuring that an appropriate tone and appropriately professional language, is used in all communications;
- being aware that email traffic or College devices may be monitored;
- being aware that if an issue addressed in an email becomes the subject of a legal dispute, then those emails would be discoverable: that is, the court and all parties to the dispute would be entitled to see them (unless protected by legal professional privilege);
- not contacting a student via written or electronic means, without a valid context;
- not sending messages that are harassing, discriminatory, defamatory, threatening, abusive or obscene;
- not taking, creating or uploading images or recordings of students or colleagues onto the Internet, or distributing such images or recordings in any way without the person's consent;
- not inviting students to join a personal electronic social network, or accepting students' invitations to join their social networking sites, unless specifically authorised by the College; and
- ensuring that where practicable, names of students, parents or Staff are not included in the subject line of emails.

Staff are expected to comply with the College's Good Practice & Etiquette Guidelines for Emails (see **Annexure B**).

Staff must never use the College network to view, upload, download or circulate sexually related or pornographic messages or material; violent or hate related messages or material; racist or other offensive messages; malicious, libellous or slanderous messages or material or subversive or other messages or material related to illegal activities.



**4.9 Comply with any reporting obligations either set out in the legislative framework under which they are employed, or mandated by the College.**

*The College has various reporting obligations imposed on it by legislation. For example, NSW legislation such as: the Children and Young Persons (Care and Protection) Act 1998; the Child Protection (Working With Children) Act 2012; and, the Ombudsman Act 1974, set out various reporting obligations upon which teachers and other members of Staff are required to report.*

Every member of Staff is expected to be aware of and comply with the College's Child Protection Policy and any reporting obligations that exist pursuant to child protection legislation.

Every member of Staff is required to inform the College Principal, if;

- they are charged with or convicted of a criminal offence or become the subject of an Apprehended Violence Order ;
- they become aware of a serious crime committed by another colleague;
- s/he becomes aware of any student or colleague harming themselves, or threatening to do so;
- they have engaged in conduct that would prevent him/her from carrying out aspects of his/her duties (e.g. loss of driver's licence or a DUI charge for Staff required to drive College vehicles); and/or,
- their Working With Children Check (WWCC) clearance is cancelled or they become a person disqualified from working or volunteering with children (as defined in child protection legislation).

Where Staff become aware of the inappropriate use of College networks, electronic communication and social networking sites, such as the transmission, storage, promotion or display of offensive, pornographic, defamatory or harassing material by any colleague or student, they are required to report this activity as follows:

- (1) Teaching Staff must report to their relevant Deputy Head of School;
- (2) Non-teaching Staff must report to the Vice Principal;
- (3) ELC Staff must report to the Director of Early Learning and Development.

**4.10 Provide an appropriate level of supervision of and engagement with students to limit their exposure to risk of injury.**

*The College is committed to providing a safe and protective environment for its Staff, students, parents. Supervision is integral to this commitment. The College is committed to ensuring adequate and appropriate supervision of students at all times.*

Staff are expected to take reasonable steps to ensure that no student is exposed to any unnecessary risk of injury.

Staff are expected to be familiar with and comply with the College's Evacuation Procedures relating to their specific campus.



Staff are expected to ensure that students are not left unsupervised either within or outside of class and expected to be punctual to class and not to let students out without supervision, before the bell.

Staff on playground duty, have a duty of care to ensure students are safe in these areas and are expected to be familiar with the Playground Duty Procedures. This requires Staff to be at their designated area of duty on time.

Teaching Staff are expected to adequately supervise sporting activities and the playground. This requires active observation not just of assigned playing fields, but also extends to changing rooms, buses and storerooms. Staff responsible for the supervision of changing rooms, should give due notice to students that they are about to enter the changing facility. Supervision should be discreet and conducted by Staff of the same gender. It is not appropriate to stand and watch students change or shower. This also applies to sleeping and changing areas on camps. For students with a disability, the management of showering and changing clothes should be included in each student's individual management plan in line with relevant College policies.

Where practicable, every member of Teaching Staff, when left with the responsibility for a single student, is expected to ensure they are with the student in an open space in view of others. Where practical, the door to any room should be left open and the Staff member should not locate themselves between the student and the door. The student-teacher meeting should be clearly visible either through an open door or window from the outside. Where this is not possible or practical it should be discussed with the member of Staff's supervisor and/or the Head of School.

Staff are expected to refrain from driving a student who is not a relative, in their personal vehicle unless they have specific permission from their supervisor or the Head of School. In an emergency, Staff should exercise discretion, but then report the matter to their supervisor as soon as the conduct has occurred. Staff who are also parents participating in lift schemes to or from the College, or College related activities, do so as part of a private arrangement. The Staff member should communicate this to participating families, and advise their line manager in writing.

Where personal items are to be confiscated Teaching Staff are expected to ask the student to hand the items over and should only take items directly from students without their permission, in circumstances where there is concern for the safety of the student or others and the member of Staff's own safety is not jeopardised.

Teaching Staff are not to adopt an ongoing support or welfare role that is beyond the scope of their position e.g. role of school counsellor or external professional.

#### **4.11 Dress in an appropriate manner**

*Teaching Staff have a responsibility to act as role models at all times, not just in attitude and behaviour, but also in dress and appearance. Staff have an obligation to dress appropriately and in a manner that is respectful of Modern Orthodox requirements and modesty (tzniut) expectations. Staff must ensure that their personal appearance and presentation is clean, tidy and appropriate for their work role (nekiut).*



Female Teaching Staff are expected to wear modest clothing and ensure that her shoulders are covered. Neat tailored pants (not blue jeans) may be worn. Leggings may only be worn if under other attire e.g. a knee length skirt. Apparel with a plunging neckline is not appropriate.

Teaching Staff are expected to wear smart casual attire on Shabbat or High Holy Day services/celebrations. Skirts or dresses should be worn by female staff on these occasions.

Male Teaching Staff are expected to wear neat tailored pants (not blue jeans) and a collared shirt. A jacket and tie should be worn on more formal occasions. The College expects Jewish Staff to wear a *Kippa* when participating in *Tefilla* services, religious events, or any events in a Synagogue.

Staff involved in coaching sport/teaching physical education may wear appropriate sports attire. Singlet tops and short shorts are not acceptable.

Clothing such as singlets, t-shirts, rubber thongs or items with inappropriate slogans (e.g. FCUK) are not acceptable.

Teaching Staff are expected to act as role models for students. Teaching Staff are expected to limit body piercings to a single pair of earrings (as is required of the College's students). Teaching Staff are expected to cover any obvious tattoos and avoid extreme hairstyles.

Teaching Staff are expected to comply with relevant WHS regulations as they apply to apparel e.g. protective clothing, safety glasses and sun-safe attire, when outdoors. Teaching Staff should wear footwear appropriate to their role. Teaching Staff working in laboratories, workshops and art rooms should wear appropriate footwear to protect their feet and minimise the risk of injury and/or accidents.

Teaching Staff visiting the campuses during holiday time, attending Staff development days or participating in off-site College activities, camps or excursions, are expected to wear smart casual attire in keeping with professional standards.

Academic dress may be required at formal Assemblies.

Teaching Staff are expected to consult the relevant Deputy Head for advice if they have questions about the College's dress code, or whether their attire is consistent with it.

#### **4.12 Ensure that you are accredited.**

*Teaching Staff who have been working in a NSW school since 1 October 2004 or those who have had a break from teaching of more than five years also have obligations to complete at least the mandatory minimum hours of professional learning (i.e. 10 Hours of Quality Teaching Council (QTC) approved and 10 Hours of Teacher Identified or (if approved) University or TAFE study each year); maintain their personal registration and accreditation with NSW Education Standards Authority (NESA) including payment of all annual fees; maintain the currency of their knowledge and understanding of their area of expertise for the efficient performance of their duties; be cognisant of the Australian Professional Standards for Teachers and engage in an annual cycle of performance development and review.*



Teaching Staff are expected to complete relevant mandatory compliance requirements and maintain the currency of all relevant qualifications including CPR and Anaphylaxis Training.

Teaching Staff are expected to complete regular and mandatory updates/professional development courses addressing Work, Health and Safety, Child Protection Legislation, Mandatory Reporting, Privacy legislation and Anti-discrimination training. Refer to Annexure C for Mandatory Training Requirements.

#### **4.13 Responsibly manage and use the College's resources**

*Staff have an obligation to: manage and use the College's resources efficiently and economically effectively for official purposes; make decisions relating to the use of resources that are reasonable, are correctly authorised and can withstand public scrutiny; and treat College property with due care and ensure it is secured against theft and misuse.*

Staff must not use the College's resources, including mobile phones, the internet, electronic mail systems, or other means of electronic communication for:

- accessing, storing, or transmitting words, images or other material that are illegal, sexually explicit, violent, or that a reasonable person would find offensive. (This does not include material that is part of a complaint, report or notification about alleged improper conduct of a person made in accordance with an authorised procedure);
- gambling;
- accessing chat lines not associated with work;
- transmitting inappropriate material;
- sending of inappropriate programs or mail; and/or
- unauthorised use of the College's email distribution lists.

Staff must not commit the College to expenditure unless within Budget parameters and where approval has been received from the approved budget holder.

Staff are expected to ensure that resources, funds or equipment entrusted to them are used safely, efficiently and economically in the course of their duties.

#### **4.14 Identify and manage conflicts of interests in an appropriate manner.**

*Personal views, or private interests, can, or have the potential to, influence a person's capacity to perform his/her duties and in turn compromise his/her integrity and that of the College. Staff are expected to ensure that his/her participation in and promotion of personal, political, religious, or community matters, does not cause any conflict of interest with his/her professional responsibilities, nor with the reputation of the College.*

Staff are expected to avoid acting in conflict with the College's best interests and ensure that their personal or financial interests do not interfere with the performance of his/her duties.

When faced with a situation in which a conflict of interest may arise, Staff are expected to:



- assess the situation and the surrounding circumstances that could affect any decisions or actions s/he may take in the matter (Ask yourself 'What is my public duty?' and "What is my personal interest?");
- identify whether any conflict of interests exist ('Could my personal interest influence my performance of the public duty?');
- determine the type of conflict of interests ('Is it actual, perceived or potential?' 'Is it pecuniary or non-pecuniary?'); and
- report any conflict to supervisors.

Examples of conflict of interest situations include:

- recruiting, or approving the recruitment of, a family member or close friend;
- taking part in the evaluation and selection of textbooks, reference books or learning materials which were written or edited by a relative or close friend, or published by a company in which you or they, have a financial interest;
- taking part in the selection and appointment of a supplier or contractor who is a relative or a close friend, or who owns a company in which you or they have a financial/business interest;
- supervising a relative or a close friend and determining his/her promotions or pay increases;
- Teaching Staff tutoring or coaching students from the College in subjects taught at the College, in return for payment;
- referring students to attend private tutorial sessions in which you have, or a relative or a close friend has, a financial/ business interest; or
- acting as carers, guardians, nannies for children enrolled at the College, unless in extenuating circumstances that have been approved by the HOS or the Director of Early Learning and Development.

Staff who are also parents, must exercise particular care. Parents who are employed by the College are to be mindful of their dual roles. When entering into matters involving their own children, they should follow the normal procedures that are able to be accessed by all parents.

Staff who have been approached to provide Bar/Bat Mitzvah lessons or services specific to Jewish instruction, must seek the approval of the Head of Jewish Life and Learning before doing so.

#### **4.15 Not seek nor accept money, gifts or benefits.**

Staff are expected to decline any gift and/or other benefit, if the gift or benefit has the potential to compromise their position by creating a sense of obligation or undermining their impartiality and the gift or benefit does not apply to something given merely in appreciation of the work of the member of Staff.

It would not be acceptable for Staff to receive gifts or benefits in the following situations:

- a company wanting to do business with the College, offers an employee two tickets to the VIP box at the football final;
- a parent gives the College \$1,000 dollars for sporting equipment on condition that his/her son is chosen for a team; or
- a parent gives a teacher an obviously expensive gift e.g. an item of jewellery from Tiffany & Co.



Staff who are offered a bribe are expected to refuse it, explain why it is not appropriate, and immediately report the matter to a supervisor, or the College Principal.

Staff must not bribe or attempt to bribe a student, colleague, parent, public official or member of the College Community.

Teaching Staff are not permitted to tutor students of the College whilst an employee unless specific permission has been given by the College Principal.

#### **4.16 Protect confidentiality**

*The College collects and stores a lot of confidential information. Unauthorised disclosures may cause people harm, or give an improper advantage. The College's integrity and credibility may be damaged if it cannot keep information secure.*

Staff are expected to only use official information for the work-related purpose it was intended.

Unless authorised to do so by force of law, Staff are expected to refrain from disclosing or using any confidential information without appropriate approval.

Staff are expected to ensure that confidential information, in any form, cannot be accessed by unauthorised people. Sensitive information should only be provided to people, either within or outside the College, who are authorised to have access to it.

Staff should only discuss other peoples' personal information with other colleagues where absolutely necessary. Normally information should be limited to those who need to know in order to conduct their duties, or to those who can assist us in carrying out our work because of their expertise.

Staff are expected to refrain from providing former staff, access to confidential information.

#### **4.17 Ensure that copyright and intellectual property is not infringed**

*The College relies on its intellectual property to deliver its services. All members of Staff play an important role in ensuring this intellectual property is properly identified, protected, and is used only where appropriate. The copyright of any material developed by members of Staff that relates to their employment with the College belongs to the College.*

Staff when creating material, are expected to ensure that the intellectual property rights of others are not infringed and information is recorded about any third party copyright/other rights, included in materials.

Staff are expected to refrain from using the College's intellectual property (including copyright) for private purposes, without first obtaining written permission from the College Principal.



#### **4.18 Ensure appropriate record keeping is maintained**

*The College relies on information to deliver its services and ensure that it is complying with regulatory obligations. For example the College is required to provide certain information to regulatory organisations such as the NESA (NSW Education Standards Authority) to gain accreditation and maintain accreditation. Good record keeping is essential to fulfilling this obligation.*

Staff are expected to create and maintain full, accurate, timely and honest records of their activities, decisions and other business transactions.

Staff are expected to capture or store records in the College's records systems, in line with the College's record keeping policy.

Teaching Staff responsible for assessing and recording marks for students' work, are expected to do so accurately, fairly, promptly and in a manner that is consistent with the College's record keeping policy.

Staff are expected to maintain the confidentiality of all official information and documents, which are not publicly available or, which have not been published.

### **5. BREACH OF THE STAFF CODE OF CONDUCT**

#### **5.1 Breaches of this Code**

This Code is designed to promote and enhance the appropriate and ethical standards of behaviour of Staff in the workplace.

Staff employed by the College are responsible and accountable for their own actions.

Staff are expected to demonstrate integrity in the conduct of his/her duties and in making statements about his/her qualifications, experiences and competencies.

Potential breaches of the Code of Conduct, including apparent breaches and allegations, will be dealt with in accordance with the principles of procedural fairness and natural justice.

Staff found to be in breach of this Code of Conduct, may be disciplined by the College.

The action to be taken where a member of Staff has been found to be in breach of this Code of Conduct, will depend on the nature of the breach.

In deciding what action is to be taken, the College will consider the following factors:

- the seriousness of the breach;
- the likelihood of the breach recurring;
- whether the employee has committed the breach more than once;
- the risk the breach poses to Staff, students or others; and
- whether the breach would be serious enough to warrant formal disciplinary action.

Actions that may be taken by the College in respect of a breach of this Code of Conduct include the following:



- appropriate warnings;
- counselling;
- demotion;
- suspension;
- dismissal; and/or
- laying of criminal charges or civil action.

The College expects all members of Staff to report suspected breaches of this Code by colleagues, to their supervisor or to the Principal. Where the suspected breach involves the supervisor, a report should be made directly to the College Principal. Where the suspected breach involves the Principal, a report should be made directly to the President of the College.

## 5.2 Whistleblower Protection

Staff should be familiar with the College's Whistleblower Policy.

The College's Whistleblower's Policy Advice for Staff is **Annexure D** to this Code of Conduct.

## 6. EXPECTATIONS OF STAFF

- 6.1 Staff can reasonably expect to work in a satisfying, productive and collegial environment where child safety and well being is promoted by all staff.
- 6.2 Staff can reasonably expect an orderly and cooperative environment, enjoying the facilities and experiences provided by the College .
- 6.3 Teaching Staff can reasonably expect to be informed (within Privacy guidelines) about matters pertaining to students that will affect the teaching and learning program for that student.
- 6.4 Teaching Staff can reasonably expect to participate fully in the College's educational program.
- 6.5 Teaching Staff can reasonably expect to engage in ongoing professional learning.
- 6.6 Teaching Staff can reasonably expect to contribute ideas and have their views and contributions treated with respect and be respected by students.



## ANNEXURE A

### The College Ethos

Moriah College is a Jewish Day School that espouses a Modern Orthodox Zionist Jewish philosophy or Jewish ethos.

In defining itself as Modern Orthodox, the College acknowledges the primacy of Halacha, (Jewish Religious Law), and promotes and practises its observance. The College endeavours to impart to its students a knowledge and love of, and encourages a commitment to, Modern Orthodox Jewish practice, beliefs and texts.

The College intends that its graduates will emerge from their College experience with a strong and sustainable Jewish identity, both motivated and equipped to act: as advocates for Israel; committed members of the Jewish community; and as engaged Australian citizens.

The College's Modern Orthodox orientation means that the College values and promotes full engagement with the secular world, as a way of enhancing the Jewishness of its students. The College believes that knowledge and understanding of science, literature and the arts provides a prism that broadens and extends the meaning of the Jewish practice of the believing Jew.

The pursuit of excellence in secular study, artistic endeavour and sporting performance is central to its secular program and is integral to the College's Jewish ethos.

The College's coeducational structure is a manifestation of its Modern Orthodox ethos, reflecting a firm belief that no distinction ought to be made between the education of boys and girls, other than in the areas of prayer and ritual where Halacha demands a difference.

As an expression of its Zionist orientation, the College strives to imbue its students with a love for the State of Israel and the Modern Hebrew language that is informed by identification with the State of Israel as the spiritual and historic homeland of the Jewish people.

The College's Jewish ethos is manifest in many practical ways. The following comprises a list of some examples as to how the College's Jewish ethos is implemented:

- *The wearing of Kippot for boys as part of the College uniform;*
- *The observance of the Jewish Sabbath, - no Shabbat-prohibited work is undertaken by the College or on behalf of the College on the Jewish Sabbath and on religious holidays. The College does not participate in sporting events or other activities that would conflict with the strict observance of the Sabbath;*
- *The strict observance of Jewish dietary laws of Kashrut;*
- *Reliance on the authority of the Sydney Beth Din (Rabbinical Court) in matters of Jewish status;*
- *Celebration and religious observance of Yom Ha'atzmaut and Yom Yerushalayim;*
- *Singing of Hatikvah;*



- *The avoidance of functions and activities that conflict with the atmosphere considered appropriate, during the various periods of mourning in the Jewish calendar; and,*
- *Daily prayer (davening) for all students.*

### Applying the College Ethos

While the College has a deliberate and definite religious orientation, it recognises that its students and their families come from a wide range of Jewish backgrounds covering the whole spectrum of religious observance. In striving to provide a comfortable home to this broad congregation, the College adopts an inclusive approach. For those who are not ritually observant, the College encourages greater Jewish commitment and expression of Jewish identity, in a manner that is constructive. Similarly, the College welcomes students who have a stricter level of ritual observance than the College practises, dealing sensitively and supportively with their particular religious needs.

Without detracting from its commitment to its Jewish ethos described above, the College follows its traditional inclusive practice in continuing to accommodate diverse expectations from its parent body by providing certain specific activities namely: permitting girls to sing in public at College events; the holding of 'co-ed' swimming carnivals; and the acceptance of sensitive themes in literature and the performing and visual arts, that are not in keeping with Modern Orthodox practice. The College endeavours to provide constructive alternative programs for, and to treat sensitively, those students whose participation in these activities is precluded by their strict adherence to Halacha.

### The College's Core Values

Demonstrate behaviours that are consistent with the College's Core Values - commitment (*mechuyavut*), responsibility (*achrayut*), respect (*kavod*) integrity (*yoshra*) and kindness (*chesed*).



## ANNEXURE B

### Email – Good Practice and Etiquette Guidelines

Staff are asked to take care with email traffic. The following guidelines should be observed when using College email accounts.

- Do not include names of individual students/staff members /parents in the subject line of the email.
- All emails should contain:  
An appropriate salutation (Dear...) and (Regards, Yours sincerely etc)  
The 'subject' should be descriptive  
The College's standard 'signature' should be used (detailing the sender's name and title (Name, Role, Department, Contact Details))
- Review emails carefully before sending by checking spelling and grammar.
- Beware of dry humour and sarcasm in emails.
- Take care when capitalising statements – this gives the impression of 'shouting'. The 'extreme' use of bold/underlined/coloured text may also be interpreted as expressing anger.
- When you receive an email, consider if replying (via email) is the best medium to continue the 'conversation'. It may be more appropriate to meet face to face.
- When copied in on an email, remember that you are a 'spectator'. The email is solely for your information.
- Take care when forwarding emails to others.
- Take care when using 'Reply All'
  - This function generates a large amount of email traffic (sometimes unnecessarily)
  - You can inadvertently include someone e.g. a parent with whom you had not intended to share your response.
- Respond to or acknowledge communications in a timely manner (within two school days), but there is no obligation or expectation for you to respond to or communicate with parents, after 6.00pm on weekdays or on weekends or public holidays.
- Do not send emails during Shabbat (from candle lighting until the end of Shabbat on Saturday evening) or on the following Jewish Festivals:
  - Pesach (the first and last two days)
  - Shavuot (Days 1 and 2)
  - Rosh Hashanah (Days 1 and 2)
  - Yom Kippur
  - Succot (Days 1 and 2)
  - Shemini Atzeret
  - Simchat Torah



*Please note: Candle lighting times are published in the College Diary*

*When a festival is followed by Shabbat, emails are still precluded right up to the end of that Shabbat.*



## ANNEXURE C

### COMMUNICATION OF POLICY AND PROCEDURES

An overview of key policies and procedures is published for Staff, Students and Parents and is published annually in the Moriah College Information Booklet. Parents are advised that they have the opportunity to access the full text of a range of policies via their secure log on to the College's Learning Management System e.g. Community Code of Conduct Policy; Child Safety and Wellbeing Policy; Attendance Policy and Procedures; Communication Policy; Complaints and Grievance Policy; Staff Guidelines for Resolving Complaints; Behaviour Management Policy; Anti-bullying Policy; Student Leadership Development Policy; and Risk Management Policy

### MANDATORY TRAINING REQUIREMENTS FOR STAFF

All permanent, casual and temporary Staff at Moriah College are bound by rules, policies and codes of conduct aimed to protect the welfare and wellbeing of students – our primary stakeholders.

Teaching Staff participate in annual training and development activities about the policies and relevant procedures. Teaching Staff receive quality professional development and training so that their teaching practices and programs are consistent with the College's policies and procedures.

Teaching Staff are reminded annually of their obligations as mandatory reporters as set out on the 'Keeping them Safe' website and as per the *Child Protection (Working with Children) Act 2012, the related Child Protection (Working with Children) Regulation 2013, the Children and Young Persons (Care and Protection) Act 1998 and the Ombudsman Act 1974*.

The Director of Accreditation (ELC-12) and Professional Practice (High School) oversees this process. The online Child Protection Update produced by the Association of Independent Schools has been used in conjunction with information provided at Teaching Staff Meetings regarding what constitutes reportable conduct and the indicators of abuse and neglect. Teaching Staff are reminded annually that they should inform the Principal when they have reasonable grounds to suspect risk of harm to a child or young person.

Moriah College is committed to ensuring a safe and healthy working and learning environment for Staff, students and visitors to all campuses across the College. At induction, Staff receive a briefing on our Work Health and Safety (WHS) procedures when the College outlines general procedures, provide advice on how to access health and safety information, and refer to the Vice Principal for specific advice on local WHS issues. The Vice Principal regularly communicates with Staff so that they have an avenue for lodging any WHS issues. Staff who are members of the WHS committee are offered training on an annual basis.



The Staff Code of Conduct summarises the expectations that the College has about how Staff will conduct themselves at the College. The document sets out ethical principles to assist Staff to make decisions and to guide their actions. The Code includes information on such topics as personal and professional behaviour; conflict of interest; gifts and the risk of being compromised; information protection and public comment; private employment; use of official resources; post separation employment; and reporting suspected wrongdoing. All staff received training about the revised Staff Code of Conduct at the commencement of 2016.

### **Areas where Teaching Staff and/or Staff receive regular mandatory training include:**

- First Aid (minimum requirement: CPR and Emergency Care)
- Medical Updates and First Aid and Health Training, for example, anaphylaxis, administration of medication and epilepsy
- Risk Assessment Planning and Risk Management of Excursions, Camps and other Variations to Routine
- Emergency Procedures
- Security and Supervision responsibilities
- WHS reporting responsibilities
- Staff and Community Codes of Conduct
- Changes to legislation impacting on WWC check and Teacher Accreditation
- Anti-bullying reporting requirements.
- Training on how to respond to allegations against employees in the area of Child Protection
- Training in Chemical Safety with regular Risk Assessment updates for Science, Technology and Visual Arts staff.

Staff are required to sign to indicate their attendance at mandatory Staff Meetings where critical updates or reminders are provided. The Director of Accreditation (ELC-12) and Professional Practice (High School) maintains records of attendance and completion for each calendar year.



## ANNEXURE D

### The College's Whistleblower Policy

#### Advice for College staff

Moriah College (the College) has a Whistleblower Policy (**Policy**) which applies to all the College's various entities. The purposes of the Policy are to encourage and manage whistleblowing; to help deter wrongdoing, in line with the College's risk management and governance framework; to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported; to ensure disclosures are dealt with appropriately and on a timely basis; to provide transparency around the College's framework for receiving, handling and investigating disclosures; to support the College's values, code of conduct and other policies; and to support the College's long-term sustainability and reputation.

The Policy manages '**qualifying disclosures**' (as defined), regarding '**disclosable matters**' (as defined) in relation to the College and to protect '**eligible whistleblowers**' (as defined) who make such disclosures to an '**eligible recipient**' (as defined).

This Advice to staff is a precis only of the Policy and staff are strongly encouraged to read the Policy which is available on eLY and published on the College website, in full.

There are four requirements (summarised below), all of which must be met in order for a disclosure to be protected under the Policy. All terms defined in the Policy have the same meaning in this Advice to staff.

If all four requirements are not met, the disclosure does not qualify for protection under the Policy, in which case if the matter is a complaint it will be considered and managed under an appropriate College policy, such as the Complaints and Grievance Policy or the *Staff Code of Conduct* or the *Anti Bullying Policies*.

However, disclosures may qualify for protection if they are a 'public interest disclosure' and 'emergency disclosure' or if they are made to ASIC, APRA or a prescribed Commonwealth authority.

The main protections available under the Policy in respect disclosures cover: confidentiality; protection from civil, criminal and administrative liability; and protection from detrimental conduct.

The four requirements that need to be satisfied in order for a disclosure to be protected under the Policy are:

| Question                         | Requirement   | Specifically  |
|----------------------------------|---|---|
| 1. Who is the disclosure made by | The disclosure must be made by an <b>eligible whistleblower</b> or ' <b>discloser</b> ' | <p>An eligible whistleblower or discloser is an individual who is or has been any of the following, in relation to the College:</p> <ul style="list-style-type: none"><li>• a member of the College Board of Directors (Board), a Trustee or a Life Patron;</li><li>• an employee;</li><li>• a person who supplies goods or services (paid or as a volunteer);</li><li>• an employee of a person who supplies goods or services (paid or as a volunteer); and</li><li>• a relative or dependent (or dependents of a</li></ul> |



| Question   | Requirement   | Specifically  |
|--|---|---|
|  |   | spouse) of any individual described above. Anonymous complaints, where the discloser's name is not known, can also meet the 'eligible whistleblower' requirement.   |
| 2. Who the disclosure is made to                               | The disclosure must be made to an ' <b>eligible recipient</b> ' | An eligible recipient is an individual who occupies any of the following roles, in relation to the school: <ul style="list-style-type: none"><li>• the College Principal, Vice Principal or Chief Financial Officer</li><li>• The President or a member, of the Board, Trustee or Life Patron;</li><li>• a legal practitioner for the purpose of obtaining legal advice or legal representation;</li><li>• an auditor, or member of an audit team, of the College;</li><li>• an actuary of the College; and</li><li>• a person authorised by the school to receive disclosures that may qualify for protection.</li><li>• Eligible recipients also include ASIC, APRA or a prescribed Commonwealth authority.</li></ul>                       |
| 3. The nature of the disclosure                                | The disclosure must be about a ' <b>disclosable matter</b> '    | A disclosable matter is information in relation to the College that concerns: <ul style="list-style-type: none"><li>• misconduct;</li><li>• an improper state of affairs or circumstances in relation to the College;</li><li>• illegal activity of the College (or its officers and employees) – meaning activity in breach of the Corporations Act or specified legislation or an offence against any law of the Commonwealth punishable by imprisonment of 12 months or more; or</li><li>• conduct (including conduct of officers and employees) that represents a danger to the public or financial system, or is prescribed by legislation.</li></ul> A disclosable matter will generally not involve a personal work related grievance. |
| 4. Is there reasonable suspicion by the eligible whistleblower | The eligible whistleblower has reasonable grounds to suspect    | Reasonable grounds to suspect, exists where the discloser has the suspicion that could reasonably be formed based on the facts and information available to them.<br><br>It is not required that the recipient believe the suspicion, merely that the suspicion held by the discloser is reasonable.  |