

Rhema Central Coast

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rhema.cc

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POLICY NAME	Whistleblower Policy				POLICY NO.	15
EFFECTIVE DATE	18/9/2020	DATE OF LAST REVISION	4/8/2021	VERSION NO.	3	
ADMINISTRATOR RESPONSIBLE			CONTACT INFORMATION			
APPLIES TO Apply group names to define applicable areas of staff.						
GROUP 1	All Staff	GROUP 2	All Volunteer	GROUP 3		
GROUP 4		GROUP 5		GROUP 6		

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
2		4/8/2021	Standardisation of Layout	Peter Alarcon
3		31/10/2023	Review of Policy	Jennifer Rangiawha

APPROVAL AND REVIEW

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ADDITIONAL NOTES

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SCOPE

Describe to what and to whom this policy applies.

This policy applies to all current and former employees, volunteers and suppliers of Rhema Central Coast, whether full-time, part-time, or casual across any level of the organisation. Rhema Central Coast would also consider the following as eligible persons under the whistleblower policy:

- Directors, managers, interns, and work experience students
- Third-party contractors, consultants, service providers, suppliers, and business partners;
- Relatives, dependents, or dependents of spouses of any employee

In this policy, the people this policy applies to are referred to as an 'eligible person' (**Eligible Person**).

POLICY STATEMENT

Describe the policy and the reason for the policy.

Rhema Central Coast is committed to a culture of good commercial practice and highly ethical behaviour with the highest standards of conduct across all business activities, with the intent to support and foster a culture of honesty and integrity.

The objectives of this policy are to:

- encourage every Eligible Person to disclose any malpractice, misconduct or conflicts of interest of which they become aware;
- provide a safe reporting mechanism and protection for every Eligible Person who makes a disclosure of allegations of malpractice, misconduct or conflicts of interest; and
- support the reporting of wrongdoing that is of legitimate concern and indicate when such disclosures will be investigated.

This policy deals with issues relating to those employees (or others) who wish to raise issues about whether Rhema Central Coast or its employees have complied with applicable laws and other standards of behaviour (such as Rhema Central Coast's policies or codes of conduct).

This policy is available on (insert link).

TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION

POLICY SECTIONS

Policy intro:

Our Commitment

Rhema Central Coast wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. Rhema Central Coast also wants to let them know about their right to be anonymous as well as how we, as an organisation, will ensure they are not subject to any retaliation or other abuse because they made a report.

- (a) This policy is designed to give guidance so that honesty and integrity are maintained at all times at Rhema Central Coast.
- (b) To the maximum extent practicable, a person who genuinely discloses an allegation or concern about compliance with laws or other standards of behaviour (Whistleblower) will be protected from any adverse action (such as dismissal, demotion, suspension, harassment, or other forms of discrimination) because they have raised such allegations. Subject to this policy, a Whistleblower is protected, even if the allegations prove to be incorrect or unsubstantiated (although a person who maliciously or vexatiously makes disclosures or makes false disclosures may be subject to disciplinary action).
- (c) Employees who participate, or assist in, an investigation involving reportable conduct will also be protected. Every effort will be made to protect the anonymity of the Whistleblower, however, there may be situations where anonymity cannot be guaranteed. In such situations, the Whistleblower will be informed.

What Should Be Reported

Rhema Central Coast has outlined below behaviour we want to be reported under this policy. We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent;
 - Illegal;
 - Corrupt;
 - Dishonest;
 - Unethical;
 - Violates the law or any legal code;
 - Is creating an unsafe environment;
 - Breaches any of our company's policies;
 - Discrimination;
 - Harassment and/or bullying of any kind;
 - Any conduct which is detrimental to Rhema Central Coast and could cause financial or non-financial loss;
- (a) Reportable conduct that can be subjected of a protected Whistleblower report is anything the Eligible Person has reasonable grounds to suspect concerns, misconduct, or an improper state of affair or circumstances.
 - (b) Examples of things that may be considered misconduct or an improper state of affair or circumstances include:
 - (i) Dishonesty;
 - (ii) Fraud;
 - (iii) Corruption;
 - (iv) Illegal activities (including theft, drug sale/use, violence, threatened violence, or criminal damage against Rhema Central Coast assets/property);
 - (v) Discrimination, vilification, sexual harassment, harassment, bullying and victimization;
 - (vi) Acts or omissions in breach of commonwealth or state legislation or local authority by-laws;
 - (vii) Unethical behaviour;
 - (viii) Other serious improper conduct (including gross mismanagement, serious and substantial waste of Rhema Central Coast resources, or repeated breaches of administrative procedures);
 - (ix) Unsafe work-practices;
 - (x) Any other conduct which may cause financial or non-financial loss to Rhema Central Coast or be otherwise detrimental to the interests or reputation of Rhema Central Coast, or any of its employees; or
 - (xi) The deliberate concealment of information tending to show any of the matters listed above.

Conduct that is not reportable

This policy does not apply to:

- (a) Personal work-related grievances;
- (b) Health and safety hazards; or
- (c) General employment grievances and complaints by a person about their own employment or situation.

Making A Report

If an employee or eligible person would like to make a report, they have different channels available where they can do this.

- Anonymous email: whistleblower@rhema.cc;
- Speak with a member of the Rhema Central Coast management team;
- Speak with a member of the Rhema Central Coast board.

How to speak up about reportable conduct

- (a) Any person who has reasonable grounds to suspect that reportable conduct as defined above or a breach of a law or other standard of behaviour has occurred, is encouraged to report that suspicion to that person's manager. If this is considered inappropriate, that person should raise the concern with a member of the Rhema Central Coast management team; by phone or email, or in writing. Any items of concern may also be raised with a member of the Rhema Central Coast board.
- (b) All disclosures should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons, witnesses, amounts, and other relevant information, in order to allow for a reasonable investigation to be conducted.
- (c) If the Whistleblower's name is disclosed in the disclosure, the person receiving the disclosure will acknowledge having received the disclosure and may initiate a follow-up meeting. However, if the disclosure is submitted on an anonymous basis, there will be no follow-up meeting regarding the disclosure and Rhema Central Coast will be unable to communicate with the Whistleblower if more information is required, or if the matter is to be referred to external parties for further investigation.
- (d) All disclosures received will be dealt with on a confidential basis and Whistleblowers are encouraged to disclose their identities, to obtain the protection afforded to them at law.

Confidentiality And Anonymity

Rhema Central Coast respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed.

If at any time you choose to disclose your identity, Rhema Central Coast will work to protect your identity and will outline and document who in the organisation will know you submitted your report. Rhema Central Coast will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that Rhema Central Coast will make every endeavour possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

- (a) Rhema Central Coast recognizes that maintaining appropriate confidentiality is crucial in ensuring that potential Whistleblowers come forward and make disclosures in an open and timely manner and without fear of reprisals being made against them.
- (b) Rhema Central Coast will take all reasonable steps to protect the identity of the Whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. In appropriate cases, disclosure of the identity of the Whistleblower, or the allegation made by them, may be unavoidable, such as if court proceedings result from a disclosure pursuant to this policy or there is a threat to life or property or if the company has an obligation to do so.

Who Can a Disclosure Be Made To

A disclosure of wrongdoing can be made to:

- a) Compliance Officer: Rick Broome
- b) Alternate Compliance Officer: Ebon Knox

It is important to note that under the Corporations Act, the whistleblower may also raise the matter with an “officer” or “senior manager” of the company. These are defined in the Corporations Act as “a director, or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the company’s financial standing.”

In making a disclosure under this Policy, employees and stakeholders must act in good faith on a genuine belief that there has been wrongdoing, and not for any malicious purpose.

Where it is determined that a disclosure is made by an employee falsely or for a malicious purpose, Rhema Central Coast reserves the right to take disciplinary action against the disclosing employee.

Employees and stakeholders disclosing wrongdoing will be protected and the investigation will be conducted in accordance with the principles of fairness and natural justice.

Investigation Process

Outlined below are the steps taken to investigate a report of wrongdoing of legitimate concern.

- Report (anonymous or otherwise) is received.
- A case manager is assigned to the report to assess it and confirm its receipt.
- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- The case manager will investigate and update management and the informant per policy guidelines.
- Once the case manager has finalised their investigation and report, management and the informant will be updated.
- At this point, the case manager will hand everything over to management for any subsequent action to take place.

How Rhema Central Coast actions a Whistleblower report

- (a) Once a disclosure has been received from a Whistleblower, Rhema Central Coast will consider the most appropriate action. This might include an investigation of the alleged conduct, either by an appropriate person or a group of people, such as a committee.
- (b) Any investigation in relation to a disclosure will be conducted promptly and fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation.
- (c) Any evidence gathered during an investigation, including any materials, documents or records, must be held by the case manager, and held securely.
- (d) During the investigation, the case manager will have access to all of the relevant materials, documents, and records. The directors, officers, employees and agents of Rhema Central Coast must cooperate fully with the case manager.
- (e) Following the investigation, a final report will be issued, and appropriate action taken where applicable.

How We Use 3rd Parties

At Rhema Central Coast, we utilise 3rd parties in our whistleblowing program and strategy. Current approved 3rd parties are listed in Contact List. Examples of how we might utilise 3rd parties include:

- **Human Resources Consultants:** Rhema Central Coast utilises human resources consultants across our business, and they might be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.
- **Accounting Firms:** Rhema Central Coast uses 3rd party accounting firms to do forensic investigation of specific reports that come through our whistleblowing program, if required.
- **Investigative Firms:** Rhema Central Coast uses specialist investigative firms to investigate specific cases where we do not have the skills needed in-house. They are also used for investigations that we would prefer a 3rd party execute on due to the nature of the report.

Who Is Alerted to a Report?

Once a report is submitted (anonymous or not), this report goes to the General Manager. This person will then assess the report and assign it to a case manager, who will manage the investigation.

Certain senior managers might be alerted to the report as part of the reporting process or if they are involved in the investigation in some manner.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared, unless Rhema Central Coast is compelled by law.

What Is the Process of Updating the Informant

As part of our investigative process, Rhema Central Coast will update the informant on the progress of the investigation. These updates can include the following:

- Rhema Central Coast has confirmed the receipt of a report from the informant.
- Rhema Central Coast has begun the investigative process.
- The investigation is currently ongoing.
- The investigation has been closed.

Rhema Central Coast will ensure that, provided the disclosure was not made anonymously, the Whistleblower is kept informed of the outcomes of the investigation of the allegations, subject to the considerations of privacy of those against whom allegations are made.

What If the Informant Is Not Satisfied with The Result

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the Board Chairman.

The informant can provide this escalation in writing so that a formal review can take place. While the Board Chairman commits to review the request, Rhema Central Coast is under no obligation to reopen the investigation. If the Board Chairman concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

Support And Protection of An Eligible Person Following a Report

Section 6 discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- Rhema Central Coast uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will Rhema Central Coast force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistleblowing program owner, etc.

When the policy will operate

This policy protects the Whistleblower against any reprisals, provided that the Whistleblower identifies himself or herself to Rhema Central Coast, and the disclosure is:

- (a) Reportable conduct under section (x) of this policy;
- (b) Submitted in good faith and without any malice or intentionally false allegations;
- (c) Based on the Whistleblower's reasonable belief that the alleged conduct, or issue related to the alleged conduct constitutes, or may constitute, a material breach of a law or other standard of behaviour; and
- (d) Does not result in a personal gain or advantage for the Whistleblower.

No reprisals

- (a) Rhema Central Coast will not take any adverse action against a Whistleblower because they have made a disclosure, which meet the above-mentioned conditions, unless the Whistleblower is a participant in the prohibited activities with respect to which the complaint is made.
- (b) If the Whistleblower was involved in the conduct, which was the subject of the disclosure, the fact that the Whistleblower has made the disclosure may be taken into account in determining the severity of the disciplinary measures, if any, that may eventually be taken against such Whistleblower.
- (c) Any reprisals against a Whistleblower are a serious breach of this policy and may result in disciplinary action, including dismissal. This protection applies to anyone providing information related to an investigation pursuant to this policy.
- (d) While it is the right of the Whistleblower to remain anonymous, if the Whistleblower does not identify themselves and requires complete anonymity, it will be hard for Rhema Central Coast to protect them.

Potential Retaliation

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, Rhema Central Coast will protect the informant from:

- Being terminated or having their employment ceased;
- Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report;

Considered Risk of Retaliation

In the case of "considered risk of retaliation", the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact the Board Chairman.

The Board Chairman will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

Retaliation Not Adequately Resolved

If the informant feels their report of retaliation was not resolved adequately, they can escalate this case in writing. The report will need to go to the entire board, and they will investigate the matter and process for how the retaliation was dealt with.

How Rhema Central Coast Deals with Retaliation

Rhema Central Coast does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that is found retaliating will face disciplinary action, including the potential to be terminated from their roles.

Separation Of Issues

Rhema Central Coast will be able to still raise any issues related to work or performance related issues. While Rhema Central Coast will protect the informant from any retaliation, it is also important that they are still effective in their job.

Rhema Central Coast can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all by any reports that have been made.

Protection And Immunity for Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

Legislative/Regulation Protection & Assistance

If in any jurisdiction or locales where Rhema Central Coast operates has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Revisions To Policy

Rhema Central Coast will periodically review this policy and procedures to improve its operation's effectiveness and update as required. In this regard, any staff member who wishes to make any comments about this policy may forward their suggestions to the General Manager.

EXCEPTIONS

Describe exceptions here.

RELATED POLICIES AND OTHER REFERENCES

ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
General Manager	The General Manager has general responsibility for the annual evaluation and update of this policy for Rhema Central Coast
Program owner/whistleblowing protection officer	The program is owned by the Board. They are responsible, either directly or by delegation, for ensuring its overall success. This includes employees knowing and understanding the program, an easy process of making a report, investigating reports, as well as being a point of escalation for any concerns or retaliation that has taken place.
Day-to-day manager	The General Manager views incoming anonymous reports, assigns these reports to case managers (which may be the GM), and manages them as they conduct investigations. This person is the first line of escalation and works collaboratively with case managers to ensure anonymous reports are heard and acted upon.
Case managers	Case managers are assigned anonymous reports, and their role is to investigate these reports. This includes interacting with and asking questions of informants, as well as using the information provided to investigate the report submitted. Their investigation can be internal or external to the organisation depending on what was documented in the report. Their goal is to gather the facts and put forth a final report to management on what happened and what action they feel needs to take place.

CONTACTS

List contacts in the table.

SUBJECT	CONTACT	PHONE	EMAIL
HR Consultant	Jennifer Rangiawha		jrangiawha@gmail.com
Accounting Firm	Contact Jennifer Rangiawha for advice		
Investigative Firm	Contact Jennifer Rangiawha for advice		