

## Policy Information

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# Whistleblowers Policy

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## 1 Purpose

Rangeville Community Church (RCC) is committed to its value of Living Authentically, including being trustworthy, honouring and honest in all our dealings so that the reputation of Jesus and his followers is enhanced. This requires that we seek to maintain the highest standards of conduct, ethical behaviour and corporate governance. To maintain this value the Council of Elders and Staff encourage the reporting of any unethical and illegal activity as well as any actual or suspected wrongdoing.

The purpose of the Whistleblowers Policy (the Policy) is to help ensure RCC maintains the highest standards of ethical behaviour and integrity in line with its values. RCC encourages and supports the reporting of serious wrongdoing that is of legitimate concern and to providing a safe reporting mechanism and protection against reprisal for people who make a disclosure regarding serious wrongdoing.

## 2 Scope

This policy applies to:

- All current and former staff of RCC
- Members of the Council of Elders and its subcommittees
- Volunteers who contribute to serving within RCC
- All other individuals who are granted access to RCC are also expected to comply with applicable provisions of the policy

A person who speaks up to report wrongdoing or misconduct under this policy is known as an eligible whistleblower. An eligible whistleblower has legal rights under the Corporations Act and other legislation. This policy does not override those rights. A whistleblower is not required to reveal their identity should they report any suspected misconduct.

### 2.1 Responsibilities in this policy

The Council of Elders is responsible for adopting the Whistleblower Policy, and for nominating a Whistleblower Protection Officer (WPO).

The WPO is responsible for;

- Overseeing the protection of whistleblowers
- Coordinating an investigation into any report received from a whistleblower
- Documenting and handling all matters in relation to the report and investigation and finalising all investigations.

The Company Secretary is responsible for the implementation of the Whistleblower Policy, including ensuring that an investigation of the charges is undertaken and adequately resourced. The Company Secretary will receive and view incoming reports, notifies the WPO to ensure reports are heard and acted upon. This includes interacting and asking questions of eligible whistleblowers (if identified), as well as using the information provided to investigate the report submitted.

### 3 Processes for making a disclosure

RCC encourages the reporting of information related to actual or suspected issues of wrongdoing or misconduct. RCC is committed to fostering a safe culture to speak up in and providing protections when reporting is undertaken. This policy is supported by clear process to ensure the safety of whistleblowers and the transparency of steps and outcomes.

#### 3.1 What should be reported

Conduct that should be reported under this policy includes breaches of general law, organisational policy, or generally recognised principles of ethics, including:

- Illegal conduct of any nature
- fraud, corruption or misappropriation of funds
- offering or accepting a bribe
- financial irregularities or maladministration
- failure to comply with, or breach of, legal or regulatory requirements
- endangering the health or safety of staff, volunteers or the general public
- engaging in or threatening to engage in detrimental conduct to staff, volunteers, contractors or others who have made, or plan to make, a protected disclosure
- conduct that damages the reputation of RCC or its relationships with third parties.
- breach of policy of RCC
- harassment or unlawful discrimination
- any other conduct or behaviour considered to be serious wrongdoing.

Reporting of non-illegal concerns or those minor in nature should be done by raising the issues through their immediate supervisor, Company Secretary, Senior Minister or Chair/Deputy Chair of the Council of Elders.

A Whistleblower must have reasonable grounds to suspect that the issue or wrongdoing reported has occurred to be protected by this policy.

Disclosures that are not about matters listed above or are considered spurious may not qualify for protection under the [Corporations Act](#).

### 3.2 How to report

Reports should be made to the organisation's nominated Whistleblower Protection Officer (WPO), via one of the below methods:

- Via the [online form](#)
- Email: [WPO@rangeville.com](mailto:WPO@rangeville.com)
- Via post to:  
Whistleblower Protection Officer  
362 Mackenzie St  
Rangeville Qld  
4350
- In person to the WPO;

Any person reporting conduct should include in writing where possible the nature of the alleged breach and the person or persons responsible. The inclusion of facts on which the eligible Whistleblower's belief that a breach has occurred will assist the process of investigation. Referring to the nature and whereabouts of any further evidence that would substantiate the eligible Whistleblower's allegations will assist the WPO in initiating the process.

### 3.3 Confidentiality and Anonymity

RCC is committed to disclosures being treated in confidence, in the case of the eligible Whistleblower self-identifying or remaining anonymous. All disclosure and investigation files will be kept in secure locations with restricted access, and interviews with relevant staff and third parties will be done with confidentiality and discretion.

The eligible Whistleblower may choose to remain anonymous when making a protected disclosure. If the disclosure is made anonymously, this will not be overridden unless by due process of law. Reporting conduct anonymously will limit the ability of the WPO to provide investigation updates and findings to the eligible Whistleblower.

## 4 Handling and Investigation of Disclosures

Upon receipt of reported information immediate steps will be taken:

1. Eligible Whistleblower reports conduct to the WPO who will confirm its receipt to the whistleblower if they choose to self-identify.
2. The Senior Minister, Chair (unless indicated as implicit in the conduct) and Council of Elders are made aware that a protected disclosure has been made.
3. The WPO will do an initial assessment to confirm it is a valid report and together with the Senior Minister decide whether or not to investigate. If the Senior Minister is included in the disclosure, the WPO will assess with the Chair or Deputy Chair of the Council of Elders.
4. The WPO will begin their investigation. This can include corresponding with the eligible whistleblower if there is a channel to do this.
5. All relevant witnesses will be interviewed and documents examined.
6. Contemporaneous notes of all discussions, phone calls and interviews will be made.
7. The WPO will update the Senior Minister and the eligible Whistleblower during the investigation as needed. If the Senior Minister is included in the disclosure, the Chair or Deputy Chair will be provided updates.
8. Findings will be documented and provided to the Senior Minister and Chair or Deputy Chair and the Council of Elders notified if necessary.

Confidentiality will be maintained during the investigation. All information obtained will be properly secured to prevent unauthorised access.

### 4.1 Findings

A report will be prepared when an investigation is complete. This report will include:

- the allegations
- a statement of all relevant findings of fact and the evidence relied upon in reaching any conclusions
- the conclusions reached (including the damage caused, if any, and the impact on the organisation and other affected parties) and their basis
- recommendations based on those conclusions to address any wrongdoing identified and any other matters arising during the investigation.

At this point, the WPO will hand everything over to the Senior Minister and Chair or Deputy Chair for any subsequent action to take place. In the event the report relates directly to the Senior Minister it will be handed over solely to the Chair or Deputy Chair of the Council of Elders. In the event the report relates directly to the Chair or Deputy Chair it will be handed over solely to the Company Secretary.

## 4.2 Information to eligible Whistleblower

Subject to considerations of the privacy of those against whom the allegations are made and customary practices of confidentiality, the Whistleblower (if identified) will be kept informed of relevant progress of an investigation as well as relevant outcomes of an investigation.

If there is no channel to communicate with the eligible Whistleblower the findings will be stored confidentially and the completed report will be noted in Council of Elders minutes of the next Council of Elders meeting.

## 4.3 Request for Formal Review

If, after receiving the summarised report of the investigation, the eligible Whistleblower is not satisfied with the result, they can escalate the matter to the Senior Minister, or if the Senior Minister was previously involved in the investigation, to the Chair or Deputy Chair.

The eligible Whistleblower should request this escalation in writing so that a formal review can take place. While the Senior Minister (or Chair/Deputy Chair) commit to reviewing the request, RCC is under no obligation to reopen the investigation. If the Senior Minister (or Chair/Deputy Chair) 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.

RCC will not tolerate any attempts to retaliate against an informant, witnesses or others involved in the investigation. A whistleblower who is a current member of staff will be protected against any unfavourable employment actions for raising allegations in good faith for serious wrongdoing. If the eligible Whistleblower believes they are targeted and retaliation is near or imminent, they should contact the WPO so that appropriate action can be taken. If the eligible Whistleblower believes their report of retaliation was not resolved adequately they can escalate this case in writing to the Senior Minister and Chair/Deputy Chair. They will investigate the matter and take further action as needed.

## 5 Contacts and further assistance

For questions about this policy, contact the Executive Pastor or Company Secretary.

## 6 Related Documents

[FRM.003.Whistleblowers Disclosure Form](#)

[Whistleblowers Website and Online Form](#)

[POL.007.Code of Conduct](#)

[POL.018.Conflicts of Interest Policy](#)



## Version Control

Version	Date	Description
1.0	21/07/2025	Initial Document
	Click or tap to enter a date.	
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