



## Whistleblowers Policy

Author(s):	Joshua Ingrames and Allen Sibley	Board Approved Date:	29 November 2019
Responsible Person:	Company Secretary (Joshua Ingrames)	Review Due:	November 2022
Version history:			

# Whistleblower Policy

## 1. Policy Statement

PeaceWise commits to being an organisation whose working environment is safe, enjoyable and productive, where our resources are stewarded appropriately, and where individuals are encouraged and feel confident to report **serious wrongdoing or misconduct** which they have reasonable grounds to suspect has been engaged in by any person working on behalf of PeaceWise.

Note: Although because of its size, PeaceWise is not legally required to have a Whistleblower policy, we choose to do so as evidence of our commitment to strong governance, accountability, and creating a safe and strong workplace environment.

## 2. Scope and Purpose

This policy applies to all employees, directors, volunteers, and contractors engaged by PeaceWise, as well as any other person who has knowledge of any suspected wrongdoing or misconduct concerning PeaceWise business affairs or its Workers.

The purpose of this policy is to provide guidance, care and protection to Whistleblowers by establishing mechanisms by which concerns about serious wrongdoing or misconduct can be raised confidentially and investigated without fear of reprisal, repercussion, victimisation or other Detriment.

This policy does not apply to workplace grievances or individual employment matters, which in the first instance should be raised either with the relevant person to whom the individual reports or, alternatively, the Chief Operating Officer.

## 3. Connection to our values

The key PeaceWise core values relevant to this policy are:

### **Accountability**

As the Church has been granted the ministry of reconciliation, we promote mutual accountability within the body of believers.

Application: All people associated with PeaceWise are accountable for their actions.

### **Wisdom**

As the fear of the Lord is the beginning of wisdom, we ground all that we do in prayer as we seek God leading and direction

Application: We will prayerfully seek God's help in responding wisely to any report made.

### **Integrity**

We are open, honest and honour our commitments.

Application: We will maintain the highest ethical standards and do what we say.

### **Example**

We strive to live out what we teach about peacemaking, and especially in the conflicts we face in our own lives and in our ministry.

Application: If we get into conflict with others over serious wrongdoing or misconduct we will model and apply the biblical peacemaking principles in our approach to resolving the issue.

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## 4. Definitions

The following definitions apply to this policy:

**Detriment** includes (without limitation) any actual or threatened:

- I. dismissal of an employee;
- II. injury of an employee in his or her employment;
- III. alteration of an employee's position or duties to his or her disadvantage;
- IV. discrimination between an employee and other employees of the same employer;
- V. harassment or intimidation of a person;
- VI. harm or injury to a person, including psychological harm;
- VII. damage to a person's property;
- VIII. damage to a person's reputation;
- IX. damage to a person's business or financial position;
- X. any other damage to a person.

**Disclosure** means notifying a relevant person of inappropriate conduct.

**Reportable Conduct** means serious wrongdoing or misconduct that the Whistleblower has reasonable grounds to suspect may have occurred or may occur, for example:

- XI. Unlawful activity including but not limited to theft, dealing in or using illicit drugs, violence and criminal damage
- XII. Dishonesty
- XIII. Fraudulent action
- XIV. Corruption or irregular use of PeaceWise's funds or resources
- XV. Unethical behaviour
- XVI. Improper or misleading accounting practices or financial reporting
- XVII. Discriminatory behaviour
- XVIII. Gross negligence
- XIX. Unsafe work practices that pose serious risk to work health and safety
- XX. Serious risk to public health, safety or the environment or
- XXI. Conduct that may cause loss or damage to PeaceWise

**Relevant Person** includes an officer or senior manager of PeaceWise, ASIC, legal practitioners and, in limited circumstances, journalists and members of Parliament.

**Whistleblower** is a person who makes a Disclosure of Reportable Conduct.

## 5. Procedures

### 5.1. Reporting

- 5.1.1.A Whistleblower who has reasonable grounds to suspect Reportable Conduct must report it to the Company Secretary of PeaceWise as soon as practicable either verbally or in writing. If the disclosure is in writing, it can be sent to the following confidential email address, which is viewable only by PeaceWise's Company Secretary:  
[whistleblower@peacewise.org.au](mailto:whistleblower@peacewise.org.au)
- 5.1.2.If a Whistleblower is uncomfortable making a Disclosure to the Company Secretary they may make the Disclosure to the Chairman or other board member who will report it to the Company Secretary (unless the Disclosure relates to the Company Secretary).
- 5.1.3.A Disclosure may be made anonymously, though this may impair the ability for PeaceWise to appropriately investigate the matter.
- 5.1.4.On receipt of a Disclosure the Company Secretary will contact the Whistleblower (if known) to notify them that the Disclosure has been received and to confirm details where required.
- 5.1.5.The details of the Disclosure will then be reviewed by the Company Secretary to determine whether an investigation into any allegations is required to be undertaken by PeaceWise.
- 5.1.6.The Company Secretary must consult with the Chair to consider the appropriate response to the Disclosure. If the Disclosure relates to the Chair, the Company Secretary must instead consult with another Director.
- 5.1.7.Part 9.4AAA of the *Corporations Act 2001* (Cth) provides a process for alternative Disclosure to ASIC, and a process for further public interest or emergency Disclosure to journalists or members of Parliament in specific circumstances arising after 90 days from the Disclosure to PeaceWise.

### 5.2. Investigation

- 5.2.1.Investigation of a Disclosure may include the Chair of the PeaceWise board, and may also include other members of the PeaceWise board where necessary and appropriate (and may include referral to an appropriate third party for investigation if the nature or severity of the allegations requires it).
- 5.2.2.PeaceWise may provide for alternative workplace arrangements for a Whistleblower following a Disclosure and any subsequent investigation, through discussion with the Whistleblower.
- 5.2.3.PeaceWise will treat all Disclosures seriously and will review, and where necessary investigate, them promptly, thoroughly and consistently with the applicable law
- 5.2.4.A person named in a Disclosure will be given the opportunity to respond to any allegations made about them.
- 5.2.5.It is expected that all individuals will co-operate fully with any investigation conducted under this policy.

### 5.3. Finalisation and Records

- 5.3.1.A Disclosure will be finalised as soon as practicable after it is made and at the conclusion of the review of a Disclosure, and any subsequent investigation, the Whistleblower will be verbally advised appropriately.
- 5.3.2.For confidentiality reasons it may not be appropriate to include details of the precise nature of any formal action taken in response to the Disclosure.

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5.3.3. All Disclosures will be recorded in a Whistleblower register, which will include the outcome of each Disclosure. This register will only be accessible by the Company Secretary. All Disclosures will be reported to the Board upon Disclosure and upon finalisation.

5.3.4. This Policy will be published on the PeaceWise website and the master copy will be retained in the PeaceWise internal document management system.

#### **5.4. Confidentiality & Protection**

5.4.1. Where a Disclosure is made to a Relevant Person, PeaceWise will keep the identity of the Whistleblower, and information that is likely to lead to the identification of the Whistleblower, confidential unless disclosed because:

- I. the Whistleblower consents
- II. it is required or authorised by law
- III. it is necessary to appropriately investigate the matter (and the Whistleblower is notified of the need to do so prior)
- IV. the Disclosure is necessary to prevent or lessen a serious threat to a person's health or safety
- V. it is necessary to protect or enforce PeaceWise's legal rights or interests or to defend any claims.

5.4.2. Where it is possible, and subject to the same considerations as in clause 5.4.1 above with Whistleblowers, PeaceWise will keep the identity of the person the subject of a Disclosure confidential.

5.4.3. PeaceWise will not tolerate any act of retribution, victimisation or other detriment against a Whistleblower, or anyone who participates in any investigation arising from a Disclosure. Such conduct will be viewed as serious misconduct and may result in disciplinary action.

5.4.4. Whistleblowers are encouraged to let PeaceWise know if they believe they need personal or pastoral support given they have made a Whistleblower report, and PeaceWise will seek to arrange for suitable support to be provided to them.