

WHISTLEBLOWER PROTECTION & DISCLOSURE POLICY

CONTENTS

1.	PURPOSE	1
2.	SCOPE	1
3.	POLICY STATEMENT	2
4.	PRINCIPLES	9
	Responsible, Accountable, Consulted and Informed (RACI)	9
	Compliance, Monitoring and Review	10
	Reporting and Records Management	10
5.	DEFINITIONS AND TERMINOLOGY	11
6.	RELATED LEGISLATION AND DOCUMENTS	13
7.	FEEDBACK	13
8.	APPENDIX A – Summary of Reporting Lines	15
9.	REVIEW AND APPROVAL DETAILS	18

1. PURPOSE

- 1.1 The purpose of this Whistleblower Policy (Policy) is to encourage honest reporting of any misconduct or wrongdoing in the Organisation and to protect individuals who make such disclosures.
- 1.2 This Policy outlines how individuals can safely express their concerns regarding Reportable Conduct (as defined in this Policy) and how the Organisation will support individuals so that they know whom to contact, how to make a report and the protections available to them as a Whistleblower.

2. SCOPE

- 2.1 The Organisation means Churches of Christ Group of Entities including Churches of Christ, Churches of Christ Care, Churches of Christ Housing Services Limited and all Churches of Christ subsidiary entities.
- 2.2 This Policy applies to all employees, officers, volunteers, directors, vendors, suppliers, contractors or relatives, spouses or dependents of any of the aforementioned persons.
- 2.3 This Policy does not replace any statutory mandatory reporting requirements to report an act of misconduct or wrongdoing.

Risk Rating: HIGH

2.4 This Policy does not cover personal work-related grievances as defined under section 3.4 of this Policy.

<input checked="" type="checkbox"/> All			
<input type="checkbox"/> Children Youth and Families	<input type="checkbox"/> Seniors Living	<input type="checkbox"/> Housing Services	<input type="checkbox"/> Integrated Communities
<input type="checkbox"/> Centenary Development Foundation	<input type="checkbox"/> Church and Community Engagement	<input type="checkbox"/> Corporate Services	

3. POLICY STATEMENT

3.1 What is whistleblowing?

— The reporting or disclosure by a Whistleblower of alleged misconduct or wrongdoing (Reportable Conduct) occurring within the Organisation. See Appendix A for a summary of all CofCQ reporting lines.

3.2 Who is a Whistleblower?

— A Whistleblower is someone who discloses Reportable Conduct and can be a current or former:

- employee or volunteer;
- officer including director or company secretary;
- contractor, supplier, consultant or service provider;
- spouses, relatives or dependents of any of the above

3.3 What can be reported? (Reportable Conduct):

— Conduct which can be reported under this Policy include:

- Misconduct (as defined in this Policy) or an improper state of affairs including in relation to tax affairs of the Organisation;
- Conduct that constitutes a contravention of the Corporations Act 2001, the Australian Securities and Investments Commission Act 2001 or any other Commonwealth laws that are punishable by imprisonment for a period of 12 months or more;
- Financial malpractice or fraud, such as engaging in questionable accounting practices, dishonestly altering organisational records, money laundering, misappropriation of funds, corruption, offering or accepting a bribe, or any other serious wrongdoing;
- Illegal activity, such as theft, illicit drug use, modern slavery, violence and damage to property (by whom refer to 2.2);

Risk Rating: HIGH

- Conduct that involves significant risk or danger to the public or to the employees of the Organisation;
 - Improper Conduct or unethical behaviour that may cause serious financial or non-financial loss to the Organisation.
- A Whistleblower is obliged to act in good faith and have reasonable grounds to suspect or believe that the disclosure is of Reportable Conduct. If information is found to be reported for malicious or vexatious purposes, action may be taken against the person making such a report.

3.4 Excluded matters:

- While the Organisation encourages everyone to report concerns, not all types of concerns are intended to be covered by this Policy. The following matters are generally not intended to be covered by this Policy:
- Customer/Client complaints: If you are a client/customer and have concerns with any product or service provided by the Organisation, please raise your concerns online via the Organisation's feedback page - <https://www.cofc.com.au/feedback> or speak to a manager of the Organisation.
 - Personal work-related grievances: If you are a current or former employee of the Organisation and want to report a grievance that directly affects you personally in the context of your employment with the Organisation, please refer to Grievance Policy and Grievance Procedure or contact the Organisation's Human Resources department. Examples of personal work-related grievances include an interpersonal conflict between the discloser and another employee; a decision about the engagement, transfer or promotion of the discloser; or a decision to suspend or terminate the engagement of a discloser. Notwithstanding the above stated, a personal work-related grievance may be raised under this Policy if it is in relation to the detrimental treatment suffered by a Whistleblower as a consequence of having made a Whistleblower Report except in cases where the action does not constitute detrimental Conduct as set out in section 3.10 of this Policy.
- Disclosures that do not amount to Reportable Conduct under this Policy will not qualify for protection under the Whistleblower Laws. In such cases, the Whistleblower will be redirected to other appropriate policies, procedures or reporting mechanisms that may assist them.

3.5 Eligible Recipients

- Under this Policy, Reportable Conduct can be disclosed to an Eligible Recipient in the Organisation. The Organisation authorises the following roles as Eligible Recipients:

Risk Rating: HIGH

- Chair of the Board;
 - Any member of the Executive Group;
 - Whistleblower Protection Officer (WPO) as defined in this Policy;
 - General Manager, Risk and Assurance;
 - Internal auditors of the Organisation;
 - For tax-related disclosures – Chief Financial Officer.
- Reportable Conduct can also be disclosed to external auditors, Australian Securities and Investments Commission (ASIC) or the Australian Taxation Office (ATO).
- Under certain circumstances as defined in this Policy, a Public Interest Disclosure or an Emergency Disclosure can be disclosed to a journalist or a parliamentarian. However, the Whistleblower is encouraged to seek independent legal advice before making a Public Interest Disclosure or an Emergency Disclosure.
- A Whistleblower must make a report to an Eligible Recipient to qualify for protections under the Whistleblower Laws.
- A report made to a legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the Whistleblower Laws also qualifies for protections under the Whistleblower Laws.

3.6 How can I make a report?

- A Whistleblower Report can be submitted in the following ways:
- Through the externally-managed whistleblower reporting line:
 - <https://cofc.stoplinereport.com/>
Provide the information requested and complete the form based on the prompts.
 - By email to: makeareport@stopline.com.au
 - QR Code: via Smartphone



- Post: Attention: Churches of Christ in Queensland, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia

3.7 Anonymous Reporting:

- A Whistleblower may choose to remain anonymous when making a Whistleblower Report, including by using a pseudonym and still qualify for protection under the Whistleblower Laws.
- There is no requirement for the Whistleblower to identify themselves at any stage during the reporting or investigation process. A Whistleblower may also refuse to answer questions that they feel could reveal their identity.
- The Organisation will respect the Whistleblower's right not to identify themselves. However, anonymous Whistleblowers should recognise that there may be some practical limitations in properly conducting the investigation if the report is anonymous. Anonymity may also mean that it is difficult for the Organisation to provide feedback on the investigation status to the Whistleblower. In any case, the Organisation is committed to fairness, and every effort will be made to satisfactorily address the whistleblower report irrespective of the reporting mechanism chosen by the Whistleblower.

3.8 What happens after a whistleblower report is submitted?

- The Organisation takes all reports and disclosures made under this Policy seriously.
- All Whistleblower Reports will be escalated to the Whistleblower Protection Officer (WPO) and the Chief Executive Officer (CEO).
- Should the WPO or CEO be implicated with the reported matter, they would not receive the report.
- The WPO will conduct preliminary enquiries to determine whether the report qualifies for protection under this Policy and if an investigation is required.
- The WPO will also consider whether to appoint an internal or external investigator to investigate the Whistleblower Report depending on the nature of the Reportable Conduct.

3.9 Investigations of reports and disclosures:

- An objective, fair and independent investigation will be conducted under the coordination of the Whistleblower Investigation Officer (WIO) to determine whether there is enough evidence to substantiate or refute the Whistleblower Report.
- When considering an investigation, the WIO will need to determine:
 - The nature and scope of the investigation;
 - The person(s) within and or outside the Organisation that should be involved in the investigation;
 - The nature of any technical, financial or legal advice that may be required to support the investigation; and

Risk Rating: HIGH

- The timeframe of the investigation.
- In certain circumstances, the Organisation may not be able to undertake a complete investigation if it is not able to contact the Whistleblower to get more information.
- As soon as practicable after the investigation is conducted, the WIO will provide a report to the WPO which outlines the findings, outcomes and recommendations.
- The WPO assigned to the report will provide the Whistleblower with regular updates of the progress of the investigation and the outcome if the Whistleblower's identity is provided at the time of making the report or disclosure. The frequency and timeframe of these updates will depend on the nature of the Reportable Conduct.
- A person accused within or connected to the matter will not be involved in the investigation.
- The Organisation recognises that employees or officers of the Organisation who are included in Whistleblower Reports under this Policy also need to be treated fairly. This will include confidentiality, procedural fairness and natural justice as part of the investigation process.

3.10 Support and protection for Whistleblowers:

- All Whistleblower Reports will be considered confidentially, and appropriate protections will be available to Whistleblowers, including their right to be safe from any form of detrimental Conduct resulting from a Whistleblower Report made under this Policy.
- The Organisation prohibits any victimisation, harassment, discrimination or detrimental Conduct against Whistleblowers. Any such detrimental conduct by the Organisation's employees may result in disciplinary action, up to and including termination of employment.
- A Whistleblower will not be subject to any civil, criminal or disciplinary action for making a Whistleblower Report under this Policy or for participating in any subsequent investigation.
- If a Whistleblower believes that their Whistleblower Report has not been sufficiently dealt with or that their confidentiality has been breached, they may raise this with the WPO or any other Eligible Recipient.
- A Whistleblower who believes they have been penalised or disadvantaged, including being subjected to victimisation, harassment, discrimination or other detrimental Conduct, as a result of their Whistleblower Report should immediately report the same to the WPO or any other Eligible Recipient.

Risk Rating: HIGH

- The Organisation does not tolerate any form of detrimental Conduct taken by any person against a Whistleblower or any people who have been involved in the investigation of a Whistleblower Report. For the purpose of this Policy, detrimental Conduct is negative action taken against any person who, in good faith, makes a Whistleblower Report and, as a result, suffers a detriment.
- Examples of detrimental Conduct can include but are not limited to:
 - Dismissal of an employee or alteration of an employee's position/duties to their disadvantage;
 - Negative performance feedback that is not reflective of actual performance;
 - Harassment, intimidation or bullying;
 - Harm or injury to a person;
 - Discrimination between an employee and other employees of the same employer;
 - Damage to a person's property, reputation, business, financial position or any other damage to a person.
- Examples of actions that are not detrimental Conduct may include:
 - Managing a Whistleblower's unsatisfactory work performance in line with the Organisation's performance management framework;
 - Administrative action that is reasonable to protect the Whistleblower from detriment/harm. (e.g., moving a Whistleblower who has made a report about their immediate work area to another office to prevent them from detriment).
- A whistleblower who believes that they are subject to detrimental Conduct as a result of their Whistleblower Report should report this to the WPO or any other Eligible Recipient.

3.11 Identity Protection (Confidentiality):

- The Organisation will treat all Whistleblower Reports in a confidential and sensitive manner and will not disclose anything that leads to the identification of the Whistleblower unless:
 - it is reasonably necessary for the purpose of investigating the matter in which case all reasonable steps will be taken to reduce the risk of the Whistleblower being identified;
 - the information is disclosed to a legal practitioner to obtain legal advice or representation;
 - the disclosure is required by law;

Risk Rating: HIGH

- the disclosure is to prevent a serious or imminent threat to life or property;
 - the disclosure is made with the written consent of the Whistleblower;
 - the information disclosed by the Organisation is de-identified, and all reasonable steps have been taken to remove the Whistleblower's identity or any information that is likely to lead to the Whistleblower being identified.
- Access to all information relating to a whistleblower report will be limited to those directly involved in managing and investigating the Whistleblower Report.
 - The WPO will ensure that each person handling or investigating a Whistleblower Report will be reminded about the confidentiality requirements, including that unauthorised disclosure of a Whistleblower's identity may be a criminal offence.
 - Unless the Whistleblower provides consent to disclose their identity for the purpose of the investigation, any personal information or reference to the Whistleblower must be redacted from communications. The Whistleblower must be referred to in a gender-neutral context.
 - All paper and electronic documents and other materials relating to Whistleblower Reports, inquiries, investigations and their outcomes and any decisions or recommendations made must be stored securely by the WIO and WPO.
 - When a disclosure or report is investigated, it may be necessary to reveal certain information to other internal or external stakeholders. If this is required, all reasonable steps will be taken to protect the identity of the Whistleblower
 - Unauthorised disclosure of information that could prejudice the confidentiality and/or the identity of the Whistleblower is a breach of this Policy and will be regarded seriously, resulting in disciplinary action if required.

3.12 Obligations of Eligible Recipients receiving report or disclosure:

- If any of the Eligible Recipients receive a Whistleblower Report, they must immediately notify the WPO, who will assist them in understanding and complying with their obligations in relation to the Whistleblower Report, especially the confidentiality obligations.
- An Eligible Recipient who receives a Whistleblower Report must at all times keep confidential the identity of the Whistleblower or any other information that is likely to identify the Whistleblower.
- If any of the Eligible Recipients, including the WIO or WPO, believe that they may have a conflict of interest by being involved in investigating a

Risk Rating: HIGH

Whistleblower Report, they must immediately notify the other Eligible Recipients and cease to be involved in the investigation.

3.13 Accessibility of this Policy:

- This Policy is made available to all staff on the Organisation's intranet site.
- This Policy is publicly available via the Organisation's website.
- This Policy is publicly available via the external service provider's website
 - <https://cofc.stoplinereport.com/>
- A person seeking legal advice with respect to their obligations under this Policy or the Whistleblower Laws must contact an external lawyer for advice.

4. PRINCIPLES

Responsible, Accountable, Consulted and Informed (RACI)

4.1 This policy is supported by roles and responsibilities in adherence to the following:

Policy Risk Rating	Accountable	Responsible	Consulted	Informed
<input checked="" type="checkbox"/> High	<input checked="" type="checkbox"/> Board	<input checked="" type="checkbox"/> CEO	Via Quality Compliance Coordinator	All workforce

Accountable Person

- is the owner and is accountable for the controlled document; and
- other than minor formatting and editing (known as admin changes), must approve all changes.

Responsible Person

- encourages a culture of good governance through the purpose or intent of a controlled document towards the culture of this organisation;
- ensures effective processes, reporting and management strategies are in place across Churches of Christ in Queensland;
- ensure risk-rated reviews are conducted in accordance with this Document Management Policy and the Policy Writing Information Sheet;
- ensures robust processes are in place to monitor compliance legislative requirements and obligations; and
- identifies risks and opportunities that can support continuous improvement opportunities.

Consulted Person/s

- identify areas within the organisation that policies and other controlled documents should be developed or reviewed for presentation to those accountable and responsible;
- evaluate and review Governing Principles and Benchmarks, providing suggestion where necessary, to the consultation process for improvements;
- provide peer support and facilitate communication between Senior Managers;
- ensure quality practice is applied through regular review;
- inform the Executive Group of any issues, within the context of the Document Management Policy, which may impact on the organisation;
- review the actions taken or proposed for significant systems improvements made by the consultation team; and
- identifies risks and opportunities that can support continuous improvement opportunities.

Informed Persons

- are identified by the term Workforce and include: Employees, Volunteers, Contractors, Students and Consultants; and
- are expected to remain informed and knowledgeable of all policies related to their own areas of work within the organisation.

Compliance, Monitoring and Review

- 4.2 This policy is mandatory and binding upon
- the Board of Churches of Christ in Queensland;
 - CEO;
 - Executive, Senior Leadership and all other Managers; and
 - Workforce.

Breaches to this policy may result in investigation, disciplinary action and reporting to the Executive/Board.

Reporting and Records Management

- 4.3 No additional reporting is required.
- 4.4 Staff must maintain all records relevant to administering this policy in a recognised Churches of Christ in Queensland record keeping system.

5. DEFINITIONS AND TERMINOLOGY

Term	Definition
Accountable	The person who has ultimate ownership of a policy. Ownership cannot be transferred.
ASIC	Australian Securities and Investments Commission
ATO	Australian Taxation Office
Consulted	The people who contribute valuable subject matter expertise to the development/review of the policy.
Eligible Recipients	<p>A person nominated by the Organisation to receive disclosures of Reportable Conduct from a Whistleblower. The following are the Eligible Recipients for the Organisation:</p> <ol style="list-style-type: none"> 1. Chair of the Board; 2. Any member of the Executive Group; 3. Whistleblower Protection Officer (WPO) as defined in this Policy; 4. General Manager, Risk and Assurance; 5. Internal Auditors of the Organisation; 6. For tax-related disclosures – Chief Financial Officer
Emergency Disclosure	<p>The disclosure of information to a journalist or parliamentarian, where;</p> <ol style="list-style-type: none"> 1. The Whistleblower has previously made a disclosure to ASIC, ATO or another Commonwealth body 2. The Whistleblower has reasonable grounds to believe that the information concerns substantial and imminent danger to the health or safety of one or more persons or to the natural environment; 3. Before making the emergency disclosure, the Whistleblower has given written notice to the body to which the previous disclosure was made that: <ul style="list-style-type: none"> o includes sufficient information to identify the previous disclosure; and o states that the Whistleblower intends to make an emergency disclosure. 4. The extent of the information disclosed in the emergency disclosure is not greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.
Informed	The people expected to remain informed and knowledgeable of the policy.
Misconduct	Misconduct includes fraud, negligence, default, breach of trust and breach of duty

Risk Rating: HIGH

Organisation	Means Churches of Christ in Queensland Group of Entities including Churches of Christ in Queensland, Churches of Christ Housing Services Limited and all Churches of Christ subsidiary entities.
Public Interest Disclosure	<p>The disclosure of information to a journalist or a parliamentarian, where:</p> <ol style="list-style-type: none"> 1. At least 90 days have passed since the Whistleblower made the disclosure to ASIC, ATO or another Commonwealth body; 2. The Whistleblower does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure; 3. The Whistleblower has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and 4. Before making the public interest disclosure, the Whistleblower has given written notice to the body to which the previous disclosure was made that: <ul style="list-style-type: none"> o includes sufficient information to identify the previous disclosure; and o states that the Whistleblower intends to make a public interest disclosure.
RACI	A matrix describing the participation by various roles in completing tasks or deliverables in support of business processes.
Reportable Conduct	<p>Reportable Conduct which can be reported under this Policy includes:</p> <ol style="list-style-type: none"> 1. Misconduct (as defined in this Policy) or an improper state of affairs including in relation to tax affairs of the Organisation; 2. Conduct that constitutes a contravention of the Corporations Act 2001, the Australian Securities and Investments Commission Act 2001 or any other Commonwealth laws that are punishable by imprisonment for a period of 12 months or more; 3. Financial malpractice or fraud, such as engaging in questionable accounting practices, dishonestly altering organisational records, money laundering, misappropriation of funds, corruption, offering or accepting a bribe, or any other serious wrongdoing; 4. Illegal activity, such as theft, illicit drug use, modern slavery, violence and damage to property; 5. Conduct that involves significant risk or danger to the public or to the employees of the Organisation; 6. Improper Conduct or unethical behaviour that may cause serious financial or non-financial loss to the Organisation.
Responsible	The person who is implements the process and monitors compliance.
Subject Matter Expert	The person/s with definitive sources of knowledge who contribute their expertise to enhance organisational efficiency.

Risk Rating: HIGH

Whistleblower	A whistleblower is anyone who is aware of any suspected wrongdoing or misconduct in the Organisation and wishes to makes a report or disclosure in connection with such misconduct or wrongdoing. For the purposes of this Policy a whistleblower can be a current or former employee, officer, volunteer, board member, director, company secretary, consultant, consultant, service provider, supplier, contractor or a relative, spouse or dependent of any of the aforementioned persons.
Whistleblower Investigation Office (WIO)	Any person(s) as nominated by the Whistleblower Protection Officer.
Whistleblower Protection Office (WPO)	Director of Governance or their delegate(s).
Whistleblower Report	A Whistleblower Report is a report or disclosure about a wrongdoing made by an eligible Whistleblower to an Eligible Recipient that qualifies for protection under the Whistleblower Laws.

6. RELATED LEGISLATION AND DOCUMENTS

Category	Related Reference Document(s)
Related Churches of Christ in Queensland Policies	Code of Conduct Policy Fairness at Work Policy
Related Legislation, Industry Standards and Care Standards	Corporations Act 2001 (Cth) Taxation Administration Act 1953 (Cth) Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 ASIC Regulatory Guide 270
Related Churches of Christ in Queensland Procedures, Supporting Documents and references	Whistleblowing and Disclosure Procedure

7. FEEDBACK

- 7.1 Churches of Christ in Queensland workforce and consumers may provide feedback about this document by one of the following mechanisms:
- internal workforce is invited to open a Quality Support Ticket by selecting 'Enquiry' from the available options; and

Risk Rating: HIGH

- consumers are invited to provide Feedback via the Churches of Christ in Queensland website.

Risk Rating: HIGH

8. APPENDIX A – Summary of Reporting Lines

	Child	Our Clients	Our People			Our Organisation
	Child Safety	External	Safety	Corporate feedback/ Incidents	Grievance	Whistleblowing
Focus	To report behaviours that impact the safety of children	To report concerns with any product or service provided by the Organisation	To report incidents involving actual or potential injury, ill-health, near miss or loss to employees, volunteers, visitors, contractors and property at all organisation locations	To support good governance and sound decision making.	To report work-related conduct or performance concerns or grievances	To report concerns regarding Reportable Conduct
Why Compliance	External Legal Requirement: <ul style="list-style-type: none"> on individuals S13E On CofC Criminal Code National Principals 	<ul style="list-style-type: none"> Aged Care Laws NDIS Provider laws Funding agreements with Commonwealth / State 	<ul style="list-style-type: none"> Work Health and Safety Laws Environment Laws 	<ul style="list-style-type: none"> Funding agreements with Commonwealth / State 	<ul style="list-style-type: none"> Employment Legislation Industrial Instruments (Awards / Enterprise Agreements) CofC Policies and Procedures 	<ul style="list-style-type: none"> Corporations Law
Why Cultural	<ul style="list-style-type: none"> Chile Safety Management Plan 	<ul style="list-style-type: none"> Complaints Management Systems 	<ul style="list-style-type: none"> WHS Management Plan 	<ul style="list-style-type: none"> Risk Management Systems 	<ul style="list-style-type: none"> Code of Conduct Fairness at Work 	<ul style="list-style-type: none"> Code of Conduct Management Plans not effective People not following Management Plan People not following Policy / Procedure

Whistleblower Protection & Disclosure Policy



Risk Rating: HIGH

	Child	Our Clients	Our People			Our Organisation
	Child Safety	External	Safety	Corporate feedback/ Incidents	Grievance	Whistleblowing
System Owner	<ul style="list-style-type: none"> Child Safety 	Each Business Services Area: <ul style="list-style-type: none"> Seniors Living Children, Youth and Families Facilities and Infrastructure 	<ul style="list-style-type: none"> Health, Safety & Rehabilitation 	<ul style="list-style-type: none"> Risk Management 	<ul style="list-style-type: none"> Employment Relations 	<ul style="list-style-type: none"> Internal Audit
Board Committee	<ul style="list-style-type: none"> Board Governance & Risk 	<ul style="list-style-type: none"> Board Governance & Risk 	<ul style="list-style-type: none"> Board Mission, People and Culture 	<ul style="list-style-type: none"> Board Governance & Risk 	<ul style="list-style-type: none"> Board Mission, People and Culture 	<ul style="list-style-type: none"> Board Governance & Risk
How	Current interim process - all workforce via safeguarding@cofcqld.com.au	<ul style="list-style-type: none"> Feedback Improvement Form or visiting www.cofc.com.au/feedback or sending an email to feedback@cofcqld.com.au 	Log the notifiable incident into CofCQ relevant database system e.g. RiskMan * If unable to log the incident into the relevant database system due to technical issues, immediately advise the Health, Safety, Rehabilitation Team (HSR), who will then log the incident. healthandsafety@cofcqld.com.au HSR Manager mobile: +61 419 759 670	Log the notifiable incident into CofCQ relevant database system e.g. RiskMan	<ol style="list-style-type: none"> In the first instance report to upline supervisor or Manager – in-person/email/phone; and/or Report to HR Support – hrsupport@cofcqld.com.au or phone 07 3363 1790 	A Whistle-blower Report can be submitted in the following ways through the externally-managed whistle-blower reporting line: https://cofc.stoplineseport.com/ <ul style="list-style-type: none"> Phone: 1300 30 45 50 Email: makeareport@stopline.com.au

Whistleblower Protection & Disclosure Policy



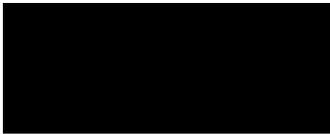
Risk Rating: HIGH

	Child	Our Clients	Our People			Our Organisation
	Child Safety	External	Safety	Corporate feedback/ Incidents	Grievance	Whistleblowing
Rules	<ul style="list-style-type: none"> CofCQ Person of Concern Policy (whole of org inc churches, approved but still to be published) CofCQ Child Safe Policy (whole of org inc churches, in draft) Both policies respond to the Queensland Criminal Code Amendments (2021) (Failure to report and Protect legislation) 	<p>Feedback Procedure</p> <p>Complaints and Appeals Management Procedure</p> <p>Feedback, Complaints and Appeals Management Procedure – HS</p> <p>Feedback and Appeals Policy</p>	<p>Health and Safety Incident Management Procedure</p> <p>Health, Safety and Rehabilitation Policy</p>	Risk Management Framework	<p>Code of Conduct Policy</p> <p>Fairness at Work Policy</p> <p>Grievance Policy</p> <p>Grievance Procedure</p> <p>Managing Underperformance and Misconduct Procedure</p> <p>Termination of Employment Procedure</p>	<ul style="list-style-type: none"> QR Code: via Smartphone  <ul style="list-style-type: none"> Post: Attention: Churches of Christ in Queensland, c/o Stopline, PO Box 403, Diamond Creek, VIC 3089, Australia National Relay Service

Risk Rating: HIGH

9. REVIEW AND APPROVAL DETAILS

Approval and Review	Details		
Policy Author and Position	Etienne Grienger, Internal Audit Manager		
Accountability (endorsed)	<input checked="" type="checkbox"/> Board <input type="checkbox"/> CEO		
Responsibility (approved)	<input checked="" type="checkbox"/> CEO <input type="checkbox"/> Executive Group		
Consulted	No.	Name	Date
	1	Rue Masunungure	15/03/2022
	2	Darryn Hammond	15/03/2022
	3	Michael Brand	17/05/2022
Informed	The workforce of the organisation known as Churches of Christ in Queensland.		
Date Endorsed	17-03-2023		
Next Review Date (calculate from the date endorsed and risk category)	4.07.2023		

Signatories	Please sign here
Accountable Owner/Endorser Name: Rue Masunungure	
Responsible Approver Name: Mike Folland - Interim CEO	

Revision History	Details
Previous Endorsed Date	04/07/2022
Amendment History	New template, website updated. RACI updated
Notes (if any)	07/03/2023 Minor update v4.01 to affect: • External service provider change only to Stopline Pty Ltd