

Title: Whistleblowing Policy	Version: 1.2
Type: Board	Adoption/revision Date: Nov 2022
Next reviewed: 2024	Monitored by: CEO

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### 1. Policy introduction and purpose

Open Doors Australia and New Zealand is committed to the highest standards of conduct, ethical behaviour and sound corporate governance across all activities. To maintain this culture the Board and Management are committed to encouraging the reporting of any unethical and illegal activity. As part of a culture of corporate compliance and ethical behaviours, Open Doors is committed to providing all eligible parties with the opportunity to report any actual or suspected wrongdoing.

The purpose of the Whistleblowing Policy (the Policy) is to help ensure Open Doors Australia and New Zealand (the Organisation) maintains the highest standards of ethical behaviour and integrity in line with the Christian beliefs. The Organisation 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. Who this policy applies to

This policy relates to all current and former employees, directors (officers), consultants and third parties (suppliers) and their employees as well as relatives, spouses and dependents of these individuals.

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.

#### 2.1 Responsibilities in this policy

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The Organisation's Board is responsible for adopting the Whistleblower Policy, and for nominating the organisation's Whistleblower Protection Officer (WPO).

The WPO is responsible for:

- overseeing the protection of whistleblowers,
- coordinating an investigation into any report received from a whistleblower, including appointing a case manager if appropriate,
- documenting and handling all matters in relation to the report and investigation,
- finalising all investigations.

The Organisation's CEO is responsible for the implementation of the Whistleblower Policy, including ensuring that an investigation of the charges is undertaken and adequately resourced.

An organisation representative receives and views incoming reports, notifies the WPO and works collaboratively with the WPO/case managers to ensure reports are heard and acted upon.

If a case manager is assigned their role is to investigate these reports. This includes interacting and asking questions of eligible whistleblower, as well as using the information provided to investigate the report submitted.

### **3. Making a disclosure**

Open Doors encourages the reporting of information related to actual or suspected issues of wrongdoing or misconduct. The Organisation 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, money laundering 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 Open Doors brand or relationship with third parties
- breach of internal policy, such as Code of Conduct or Conflicts of Interest
- harassment or unlawful discrimination

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Reporting of non-illegal concerns or minor in nature should be done via the existing internal control. This includes raising the issues through an employee's people manager, Workplace Health and Safety systems and other relevant policies such as Code of Conduct.

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 may not qualify for protection under the Corporations Act.

### 3.2 How to report

Reports should be made to an appropriate **organisation representative** as outlined below:

- a) their manager: or, if they feel that their manager may be complicit in the breach,
- b) the CEO: or, if they feel that the CEO may be complicit in the breach,
- c) the Chair of the Board; or,
- d) the organisation's nominated Whistleblower Protection Officer (WPO), via one of the below methods:

- Email: [whistleblower@od.org.au](mailto:whistleblower@od.org.au)
- Via post to the People and Culture Manager

#### **People and Culture Manager**

Open Doors Australia New Zealand  
11/10 Gladstone Rd  
Castle Hill, NSW 2154

- By secure email to the People and Culture Manager, who is the WPO:-
- In person; or, if they feel this to be necessary,
- via the complaints form on the Open Doors website
- the duly constituted authorities responsible for the enforcement of the law in the relevant area.

Any person reporting conduct should include in writing where possible the nature of the alleged breach and the person or person 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

The Organisation 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.

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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 disclosure

Upon receipt of reported information immediate steps will be taken:

<b>1</b> Eligible Whistleblower reports conduct to an organisation representative.
<b>2</b> WPO is informed and a case manager assigned to the report to assess it and confirm its receipt.
<b>3</b> The Chair and Board are made aware that a protected disclosure has been made.
<b>4</b> Unless indicated as implicit in the conduct, the CEO is informed of the disclosure. The Chair is also notified (or the Company Secretary if the Chair may be complicit in the breach).
<b>5</b> The case manager will do an initial assessment to confirm it is a valid report and together with the WPO and CEO decide whether or not to investigate. If the CEO is included in the disclosure, the WPO will assess with the Chair.
<b>6</b> The case manager will begin their investigation. This can include corresponding with the eligible whistleblower if there is a channel to do this.
<b>7</b> All relevant witnesses will be interviewed and documents examined.
<b>8</b> Contemporaneous notes of all discussions, phone calls and interviews will be made.
<b>9</b> The case manager will update the WPO and CEO and the eligible Whistleblower during the investigation as needed. If the CEO is included in the disclosure, the Chair will be provided updates.
<b>10</b> Findings will be documented and provided to the CEO and Board Chair.

Strict security will be maintained during the investigative process. 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

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- recommendations based on those conclusions to address any wrongdoing identified and any other matters arising during the investigation.

At this point, the case manager will hand everything over to the CEO and Chair for any subsequent action to take place. In the event the report relates directly to the CEO it will be handed over solely to the Chair of the Board. In the event the report relates directly to the 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 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 Board minutes of the next Board 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 CEO, or if the CEO was previously involved in the investigation, to the Chair.

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

The Organisation will not tolerate any attempts to retaliate against an informant, witnesses or others involved in the investigation. 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 CEO and Chair. They will investigate the matter and take further action as needed.

## **5 Christian values**

The Organisation operates in local and global cultural values that seek to honour God and expand the Kingdom. We are committed to honest and ethical behaviour underpinning how we as an

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organisation should conduct ourselves. We reflect the Biblical mandate for truthfulness and respect for all people, and all people involved in whistleblowing investigations will be treated with fairness and respect.

## 6 Glossary and supporting documents

**Organisation representative** is an appropriate person authorised to receive a whistleblower report on behalf of the Organisation (as outlined within this policy).

**The Organisation** is Open Doors Australia New Zealand and any associated entities.

**Eligible Whistleblower** is a person who, whether anonymously or not, makes, attempts to make or wishes to make a report in connection with reportable conduct under the protection of relevant legislation.

**Whistleblower Protection Officer (WPO)** is the person within the organisation responsible for coordinating the whistleblower.

Related documents:

- Open Doors International Whistleblower policy
- Staff Code of Conduct
- Bullying and Harassment Policy
- Discrimination Policy
- Delegation of Authority Policy
- Conflict of Interest Policy
- Risk Management Policy

External references:

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

<https://www.acnc.gov.au/tools/factsheets/whistleblower-protections>