# **GOV10 Whistleblower policy**

## **Document History**

Version	Board approval date	Author	Change history	Review date
1.0	3 August 2023	S Lim	New policy for Board Approval	12 months
1.0	29 August 2024	S Lim	Reviewed – no changes	12 months
1.0	August 2025	S Lim	Reviewed – no changes	12 months

## 1.0 Company's Purpose

1.1 The Company's purpose is to be the national body of The Uniting Church in Australia (the Uniting Church) to respond to and provide support for children and vulnerable persons who have suffered abuse at the hands of the Uniting Church or participating institutions, including by participation in a nationally consistent equitable redress scheme.

## 2.0 Policy Purpose

- 2.1 Under the Company's constitution, Clause 30.4 states;
  - The directors may make regulations and policies consistent with this constitution for the proper control, management and administration of the company and amend or rescind those documents.

The purpose of this policy is to set out the Company's Whistleblower Policy.

## 3.0 Application

3.1 This policy applies to the directors and employees of UCA Redress Limited. Other stakeholders can make whistleblower disclosures under this policy, in relation to wrong doing within UCA Redress Ltd.

## 4.0 Policy statement

4.1 The Company is committed to high standards of ethical and legal conduct, the proper management of resources, high standards of professional behaviour and a workplace that is safe and healthy. The Company encourages the reporting of actual or suspected wrongdoing. This policy provides protection for any person making such a report.

#### 5.0 How to make a whistleblower report

- 5.1 A whistleblower report may be made to:
  - the National Director of the Company (the Whistleblower Protection Officer)
  - any Board Director of the Company



- the General Secretary, UCA National Assembly
- external whistleblower hotline engaged by the Assembly (NSW/ACT Synod)
- 5.2 Reports may be made confidentially and anonymously.

## 6.0 What should be reported?

You are encouraged to speak up if you have reasonable grounds to suspect any misconduct, wrongdoing or illegal conduct involving the Company or its employees. This includes any breaches of the law, our Code of Conduct or anything else you feel may be impacting the Company, its employees, or stakeholders. Making a report under this policy may be considered as 'reportable conduct'.

Reportable Conduct may include:

- Fraud, theft or dishonest conduct (including falsification of records);
- Bribery, corruption, money laundering or secret commissions;
- Illegal, unethical or improper conduct (drug use, violence, criminal damage);
- Breach of employment, labour or workplace health and safety or any other laws;
- Conduct that damages our reputation or brand or relationships with third parties;
- Breach of an internal policy (e.g. Code of Conduct or Conflicts of interest);
- Breaches of confidentiality and disclosure of confidential information;
- Representing a danger to the public or the financial system;
- Any other inappropriate behaviour, misconduct or improper state of affairs;
- An offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; and
- Prescribed by regulations under the Corporations Act 2001.

Reportable Conduct does not include personal work-related grievances. Personal work-related grievances include, but are not limited to, interpersonal conflicts between employees, work performance issues, or a decision relating to the engagement, transfer, or promotion of an employee.

## 7.0 Protection of reporters

UCA Redress Ltd is committed to protecting anyone that speaks up by:

• Protecting your identity: we will not share your identity, or information that is likely to lead to your identity being known, unless you give your consent, or it's required by law. We will always ask for your consent before disclosing your identity or any of the information you provide to another party;





- Ensuring Fairness: we are committed to ensuring you are treated fairly and that you are not disadvantaged or discriminated against as a result of speaking up. We will assess your report and take all reasonable and appropriate actions to consider, investigate and resolve the issues raised. Each report will be treated on its own merits in terms of the appropriate action or response but in all circumstances, we are committed to ensuring fairness to all parties involved;
- Providing Support: we understand and acknowledge that speaking up can be difficult and we are committed to providing support to you, and any other impacted party, throughout the process. As part of that commitment, you will have access to UCA Redress Ltd Whistleblower Protection Officer (WPO). Our WPO is responsible for ensuring protections under this policy are enforced and maintained.
- Protection from detriment: A person must not engage in conduct that causes and threatens to cause detriment to a discloser (or another person) in relation to a disclosure.

If you have any questions or concerns regarding the protections that apply to you, and the support being provided, you are encouraged to contact the Whistleblower Protection Officer (WPO) via email: <a href="mailto:info@redress.uca.org.au">info@redress.uca.org.au</a>.

### 8.0 Report handling and investigations

Upon receipt of a report, the person receiving the report will assess the report and obtain as much information as possible and, given the size of UCA Redress Ltd, may seek external support. All information will be documented and securely stored to ensure we can maintain confidentiality of your report and protect your identity. The person receiving the report will take the time required to build rapport, display empathy, and elicit the appropriate amount of information from you. The response will be trauma informed as much as possible. The more information you can provide during the reporting process the better, as this will enable UCA Redress Ltd to make an informed and considered assessment of the most appropriate response.

Depending on the issue being raised, an investigation may be required. If an investigation is required, external support may be sought. The person to whom you disclosed will be your point of contact for ensuring you are protected and supported throughout the process.

You can receive updates, provide more information and ask questions regarding your report and the investigation.

#### 9.0 Breach of Policy

Any person who is found to have breached this policy will be subject to disciplinary action, up to and including termination of employment.



# 10.0 Related documents

GOV04 Complaints and feedback policy GOV09 Code of Conduct HR02 Workplace Health and Safety policy

Signed	Name and position	Date
Approved by Board		19 August 2025