

# WHISTLEBLOWER POLICY

## RIMPA GLOBAL

RECORDS AND INFORMATION MANAGEMENT  
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information  
Management Profession.

## Contents

1	Document Control .....	2
2	Related Polices, Procedures or Documents .....	2
3	Amendment, Modification or Variation .....	3
4	Introduction .....	3
5	Purpose .....	3
6	Concerns Regarding Illegal or Corrupt Behaviour .....	3
7	Concerns Regarding Improper or Unethical Behaviour .....	4
8	Defamation .....	5
8.1	Protection from Defamation for the Whistleblower .....	5
8.2	Responsibility of the Whistleblower .....	5
8.3	Protection for Accused Individuals.....	5
8.4	Responsibilities .....	5
8.5	Definitions .....	5
9	Processes .....	6
9.1	External Reporting Entities .....	6
9.2	Reporting.....	6
9.3	Anonymity .....	7
9.4	Findings.....	7
10	Protection of Complainant .....	7
11	relevant legislation.....	7

## 1 Document Control

VERSION	DATE	AUTHORS	APPROVAL	COMMENTS
0.1	6 February 2024	Anne Cornish		Initial Draft Document
1.0	1 March 2024	Anne Cornish	RIMPA Global Board	Flying Minute 24/4

## 2 Related Polices, Procedures or Documents

NUMBER	DOCUMENT NAME	INTERNAL OR EXTERNAL
1.0	Complaints and Grievance Policy	External

### 3 Amendment, Modification or Variation

This Code of Conduct is effective from 1 March 2024 and is reviewed every two years.

This Code of Conduct may be amended, varied, or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.

### 4 Introduction

The Board of RIMPA Global is committed to operating legally (in accordance with applicable legislation and regulation), properly (in accordance with company policy and procedures), and ethically (in accordance with recognised ethical principles). The RIMPA Global network is expected to cooperate with the company in maintaining legal, proper, and ethical operations, if necessary, by reporting non-compliant actions by other people. Correspondingly, employees who do assist in maintaining legal, proper, and ethical operations should not be penalised in any way.

### 5 Purpose

The purpose of this policy is to:

- (a) encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to RIMPA Global or damage to its reputation
- (b) enable RIMPA Global to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for the secure storage of the information provided
- (c) establish the policies for protecting whistleblowers against reprisal by any person internal or external to the entity
- (d) provide for the appropriate infrastructure
- (e) help to ensure RIMPA Global maintains the highest standards of ethical behaviour and integrity.

### 6 Concerns Regarding Illegal or Corrupt Behaviour

Where a person believes in good faith on reasonable grounds that anyone from the RIMPA Global network has breached any provision of the general law that person must report their concern to:

- (a) the CEO or if they feel that the CEO may be complicit in the breach:
  - i. the company's Chair of the Board
  - ii. a person or office independent of the company nominated by the company to receive such information
  - iii. the duly constituted authorities responsible for the enforcement of the law in the relevant area.

The person making their concern known shall not suffer any sanctions from the company on account of their actions in this regard provided that their actions:

- (a) are in good faith
- (b) are based on reasonable grounds

- (c) conform to the designated procedures.

Any person within the company to whom such a disclosure is made shall:

- (a) if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision
- (b) if they believe the behaviour complained of to be neither trivial nor fanciful, ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding.

Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the company.

## 7 Concerns Regarding Improper or Unethical Behaviour

Where a person believes in good faith on reasonable grounds that anyone from the RIMPA Global network has breached any provision of the company's constitution, or its bylaws, or its policies, or its code of conduct, or generally recognised principles of ethics, that person may report their concern to:

- (a) the CEO or if they feel that the CEO may be complicit in the breach:
  - i. a person or office independent of the company nominated by the company to receive such information.

The person making their concern known shall not suffer any sanctions from the company on account of their actions in this regard provided that their actions:

- (a) are in good faith
- (b) are based on reasonable grounds
- (c) conform to the designated procedures.

Any person within the company to whom such a disclosure is made shall:

- (a) if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision
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Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

Disclosures may be made anonymously, and this anonymity shall as far as possible be preserved by the company.

## 8 Defamation

### 8.1 Protection from Defamation for the Whistleblower

RIMPA Global commits to protecting the whistleblower from retaliation, including protection against defamation claims, provided the report is made in good faith and the whistleblower reasonably believes the information to be true. RIMPA Global recognises the importance of confidentiality and will strive to protect the identity of the whistleblower to the extent possible under the law.

### 8.2 Responsibility of the Whistleblower

The whistleblower must ensure that any report made is based on facts to which they reasonably believe to be true and is not made maliciously or with the intent to defame any individual or entity. The whistleblower is encouraged to provide as much evidence as possible to support the allegations.

### 8.3 Protection for Accused Individuals

Individuals who are accused of misconduct as part of a whistleblower report are entitled to protection from defamation. The organisation will conduct all investigations with discretion and fairness, ensuring confidentiality is maintained to protect the reputations of all involved until an investigation is concluded as per the Complaints and Grievances policy

### 8.4 Responsibilities

The company's Board is responsible for adopting this policy.

The company's CEO is responsible for the implementation of this policy.

Anyone from the RIMPA Global network is responsible for reporting breaches of general law, company policy, or generally recognised principles of ethics to a person authorised to act on such breaches.

### 8.5 Definitions

A whistleblower is anyone from the RIMPA Global network who, whether anonymously or not, makes, attempts to make, or wishes to make a report in connection with reportable conduct and wishes to avail themselves of protection against reprisal for having made the report.

Breaches of general law, company policy, or generally recognised principles of ethics include:

- corrupt conduct
- fraud or theft
- official misconduct
- maladministration
- harassment or unlawful discrimination
- practices endangering the health or safety of the RIMPA network, or the general public
- practices endangering the environment.

Complaints regarding occupational health and safety should where possible be made through the company's occupational health and safety procedures.

## 9 Processes

### 9.1 External Reporting Entities

The Board may nominate external persons or agencies to which disclosures may be made under the protections offered under this policy. Where such a nomination is made, anyone from the RIMPA Global network should be informed by any appropriate method.

### 9.2 Reporting

Where a person of RIMPA Global believes in good faith on reasonable grounds that any employee, volunteer, or contractor has breached general law, company policy, or generally recognised principles of ethics, that person must report their concern to:

- the CEO or if they feel that the CEO may be complicit in the breach:
  - the Chair of the Board
  - the duly constituted legal authorities responsible for the enforcement of the law in the relevant area.

These procedures do not authorise any person to inform commercial media or social media of their concern, and do not offer protection to any person who does so, unless:

- it is not feasible for a person to report internally
- existing reporting channels have failed to deal with issues effectively.

Any person reporting such a breach should be informed that:

- as far as lies in the company's power, the person will not be disadvantaged for the act of making such a report
- if the person wishes to make their complaint anonymously, their wish shall be honoured except insofar as it may be overridden by due process of law
- reporting such a breach does not necessarily absolve the person from the consequences of any involvement on their own part in the misconduct complained of.

Any such report should where possible be in writing and should contain, as appropriate, details of:

- the nature of the alleged breach
- the person or persons responsible for the breach
- the facts on which the person's belief that a breach has occurred, and has been committed by the person named, are founded
- the nature and whereabouts of any further evidence that would substantiate the person's allegations, if known.

Evidence to support such concerns should be brought forward at this time if it exists. The absence of such evidence will be taken into account in subsequent consideration of whether to open an investigation into the matter. However, absence of such evidence is not an absolute bar to the

activation of the company's investigative procedures. The existence of such a concern is sufficient to trigger reporting responsibilities.

In contemplating the use of this policy, a person should consider whether the matter of concern may be more appropriately raised under either the company's constitutional grievance procedures or its disputes resolution policy.

### 9.3 Anonymity

If the person wishes to make their complaint anonymously, their wish shall be honoured except insofar as it may be overridden by due process of law.

The person should, however, be informed that the maintenance of such anonymity may make it less likely that the alleged breach can be substantiated in any subsequent investigation.

Where anonymity has been requested the person is required to maintain confidentiality regarding the issue on their own account and to refrain from discussing the matter with any unauthorised persons.

### 9.4 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 company 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.

The report will be provided to the person making the allegation (with, if necessary, any applicable confidentiality stipulations).

## 10 Protection of Complainant

Where the investigation has found that the person making the allegation made it in good faith on reasonable grounds and the person is from the RIMPA Global network, the CEO shall designate an officer to be responsible for ensuring that the person suffers no employment-related disadvantage on account of their actions in this matter and to provide additional support for the person where necessary.

## 11 Relevant Legislation

Australia	<a href="#">Public Interest Disclosure Act 2013</a>
ACT	<a href="#">Public Interest Disclosure Act 2012</a>
NSW	<a href="#">Public Interest Disclosures Act 1994</a>
NT	<a href="#">Public Interest Disclosure Act 2008</a>
Queensland	<a href="#">Public Interest Disclosure Act 2010</a>

**Australia:** Phone (Free): 1800 242 611 | **New Zealand:** Phone (Free): 0800 400 625  
**Address:** 1/43 Township Drive, Burleigh Heads QLD 4220 Australia | **Email:** [admin@rimpa.com.au](mailto:admin@rimpa.com.au) | Visit [rimpa.com.au](http://rimpa.com.au)