

# WHISTLEBLOWER POLICY

## RIMPA GLOBAL

RECORDS AND INFORMATION MANAGEMENT  
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information  
Management Profession.

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## 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
1.01	11 February 2026	Governance and Risk Committee		Review
1.02	5 May 2026	Governance and Risk Committee		Amendments made due to Board feedback.
2.0	18 May 2026	Governance and Risk Committee	RIMPA Global Board	Approved via Flying Minute 26/8

## 2 Related Polices, Procedures or Documents

NUMBER	DOCUMENT NAME	INTERNAL OR EXTERNAL
1.0	Complaints and Grievance Policy	External
2.0	Workplace Health and Safety Policy	Internal

## 3 Amendment, Modification or Variation

This Whistleblower Policy is effective from 1 March 2024 and is reviewed every two years.

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

## 4 Introduction

The Board of the Records and Information Management Practitioners Alliance Global (RIMPA Global) is committed to facilitating the disclosure and timely investigation of any serious wrongdoing related to our work, the company or its operation.

We are committed to protecting people who make disclosures in accordance with the *Corporations Act 2001* (Corporations Act)

<https://www.legislation.gov.au/C2013A00133/latest/text>.

The RIMPA Global network is expected to cooperate with RIMPA Global in maintaining legal, proper, and ethical operations, if necessary, by reporting non-compliant actions by other people.

This policy is governed by the laws of Australia, including the Corporations Act 2001 (Cth). Individuals located outside Australia may not have access to the same statutory protections available under Australian law, but RIMPA Global will apply this policy consistently to all persons covered by its scope.

## 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 investigate reports from disclosers in a way that is timely, and will protect the identity of the discloser and provide for the secure storage of the information provided
- c. establish the controls and procedures for protecting disclosers against reprisal by any person internal or external to RIMPA Global
- d. provide for the appropriate infrastructure to be embedded to support this policy
- e. help to ensure RIMPA Global maintains the highest standards of ethical behaviour and integrity.

This policy does not apply to general complaints or grievances, which are managed under the Complaints and Grievance Policy.

## 6 Scope and Audience

This policy will apply to protected disclosures by any current or former RIMPA Global:

- a. Board Member
- b. Committee Member
- c. Employee
- d. Contractor
- e. Member
- f. Volunteer

Any person identified above will be referred to in this policy as a “discloser”.

## 7 Definitions

Phrase	Definition
Accused Person	An individual against whom a disclosure is made.
Anonymity	The state where the identity of the discloser is not known. RIMPA Global will take all reasonable steps to preserve anonymity, subject to legal requirements.
Authorised Person	A person or office approved by the CEO or Board to receive and manage disclosures under this policy.
Company	Records and Information Management Professional Alliance Global (RIMPA Global).
Confidential Information	Information that is not publicly available and is disclosed in connection with a report, including the identity of the discloser and any information that could identify them.
Complaint	A concern or information complaint which refers to any accusation or allegation.
Detriment (or Reprisal)	Any actual or threatened disadvantage suffered by a person due to making a disclosure. This includes dismissal, injury, alteration of duties, harassment, intimidation, or discrimination.
Director	An elected Director or a person appointed a specialist by the Board (independent Director) to manage the business of RIMPA Global in accordance with the RIMPA Global Constitution.
Disclosure (or Report)	The communication of information by a discloser regarding reportable conduct under this policy.
Discloser	A current or former Board Member, Committee Member, Employee, Contractor, Member, or Volunteer of RIMPA Global who makes, attempts to make, or intends to make a disclosure.
Eligible Recipient	A person authorised to receive a disclosure under this policy, including the CEO, Chair of the Board, or any Authorised Person.
Employee	A person formally employed by RIMPA Global.
Good Faith	A disclosure made honestly, without malice, and with a genuine belief that the information is true.
Investigation	A formal process to assess and examine a disclosure to determine the facts and reach findings.
Investigator	A person or entity appointed to conduct an investigation under this policy.
Member	A person who has a specific membership with RIMPA Global, whose name appears on the register of members.

Phrase	Definition
Procedural Fairness (Natural Justice)	The process of ensuring that all parties are treated fairly. This includes the right to be heard, the absence of bias, and decisions based on evidence.
Protected Disclosure	A disclosure made by a discloser who has reasonable grounds to suspect that reportable conduct has occurred, and who makes the disclosure in accordance with the Corporations Act 2001 and this policy.
Reasonable Grounds	A belief based on facts that would lead a reasonable person to suspect wrongdoing.
Reportable Conduct	Conduct that is illegal, unethical, or improper, including but not limited to: <ol style="list-style-type: none"> <li>fraud or theft</li> <li>corrupt conduct</li> <li>maladministration</li> <li>harassment or unlawful discrimination</li> <li>conduct that endangers health, safety, or the environment</li> <li>breaches of law, the Constitution, policies, or the Code of Conduct.</li> </ol>
RIMPA Global	Records and Information Management Professional Alliance Global.
Serious Wrongdoing	Conduct that is significant in nature and may cause harm to individuals, financial or non-financial loss to RIMPA Global, or damage to its reputation.
Volunteer	Person who provides goods or services to RIMPA Global without being paid.
Whistleblower	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.

## 8 Eligible Recipients

Eligible Recipients are persons authorised to receive a Disclosure under this policy. A Discloser may make a Disclosure to:

- the CEO
- the Chair of the Board
- an Authorised Person approved by the CEO or Board.

A Disclosure may also be made to an external regulator where permitted by law.

## 9 Protected Disclosures

What is a protected disclosure? A protected disclosure is when the Discloser:

- believes on reasonable grounds that there is, or has been, serious wrongdoing in or by RIMPA Global

- b. discloses information about the wrongdoing in accordance with the *Corporations Act 2001* (section 9.4AAA)<http://www.comlaw.gov.au/Details/C2013A00133> and this policy does not disclose information in bad faith.

## 10 Concerns Regarding Illegal or Corrupt Behaviour

Where a person reasonably and in good faith believes that a member of the RIMPA Global network has breached any provision of the general law, they must report the matter to:

- a. the CEO or if they feel that the CEO may be complicit in the breach:
  - i. the RIMPA Global Chair of the Board
  - ii. a person or office authorised by RIMPA Global to receive such information
  - iii. the Australian Securities and Investments Commission (ASIC) as the regulator under the Corporations Act (2001)
  - iv. 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 RIMPA Global 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 RIMPA Global 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 Discloser 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 Discloser 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 RIMPA Global.

## 11 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 constitution, bylaws, policies, 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. the RIMPA Global Chair of the Board
  - ii. a person or office authorised by RIMPA Global to receive such information.

The person making their concern known shall not suffer any sanctions from RIMPA Global 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 Discloser 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 Discloser 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 RIMPA Global.

## 12 Defamation

### 12.1 Protection from Defamation for the Discloser

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

### 12.2 Protection for Accused Individuals

Individuals who are accused of misconduct as part of a whistleblower report are entitled to protection from defamation. RIMPA Global 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.

## 13 Responsibilities

### 13.1 Responsibilities of the Discloser

The Discloser 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 Discloser is encouraged to provide as much evidence as possible to support the allegations.

### 13.2 Responsibilities of RIMPA Global

- a. The RIMPA Global Board is responsible for adopting this policy.
- b. The RIMPA Global CEO is responsible for the implementation of this policy and ensuring that the appropriate systems and resources are in place.

The CEO may authorise external persons or offices to which disclosures may be made.

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. They should cooperate with any investigations in accordance with this policy.

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 Global network, or the general public
- practices endangering the environment.

Complaints regarding occupational health and safety should, where possible, be made through RIMPA Global's occupational health and safety procedures.

## 14 Reporting

This policy does not authorise any person to inform commercial media or social media of their concern, and does 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 it lies in RIMPA Global'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.

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. Absence of such evidence does not preclude the initiation of RIMPA Global's investigative procedures. The existence of a concern alone is sufficient to trigger reporting obligations and 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 constitutional grievance procedures or disputes resolution policy.

### 14.1 Information to Include

Where possible a Protected Disclosure should include:



- a. A description of the alleged serious wrongdoing
- b. The name (s) of the people involved
- c. Advise what alerted you to become aware of the serious wrongdoing
- d. Dates, locations and any relevant events
- e. Provide any supporting evidence or documentation that supports your allegations.

## 14.2 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 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.

## 14.3 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 RIMPA Global 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 Discloser (with, if necessary, any applicable confidentiality stipulations).

## 15 Protection of Discloser

Where an investigation finds that the Discloser made the disclosure in good faith on reasonable grounds, and the Discloser is employed or otherwise engaged by RIMPA Global, the CEO shall designate an officer to ensure that the Discloser suffers no disadvantage in their employment or engagement with RIMPA Global as a result of making the disclosure, and to arrange additional support where necessary.

## 16 Compliance with this Policy

Any variation to this policy may result in disciplinary action, up to and including termination of employment, removal of volunteer duties and potential cancellation of RIMPA Global membership.