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1. PURPOSE

1.1. The Whistleblower Policy is rooted in the CRCA's commitment to safeguarding, ethical conduct, transparency and accountability. It provides a framework for receiving and responding to disclosures about misconduct, wrongdoing or serious breaches of CRCA policy.

1.2. The policy supports prompt, fair and confidential handling of disclosures, protects people who raise concerns in good faith, and recognises that statutory whistleblower protections may apply to some CRCA entities. Where those statutory protections apply, including under Part 9.4AAA of the Corporations Act 2001 (Cth), they operate alongside this policy and are not displaced by it.

2. BIBLICAL AND THEOLOGICAL BASIS

2.1. Accountability is modelled when Nathan confronts King David (2 Samuel 12); the people of God are called to speak truthfully and to address wrongdoing even where doing so is difficult.

2.2. Ephesians 4:25 calls believers to speak truthfully with one another. Isaiah 1:17 and Micah 6:8 call God's people to seek justice and righteousness. Psalm 82:3 and Proverbs 31:8-9 call the community to defend the vulnerable and speak for those who cannot speak for themselves.

2.3. This policy gives practical expression to those commitments by providing a safe pathway to raise concerns and protect people who act in good faith.

3. SCOPE

3.1. This policy applies to all members, pastors, elders, staff, volunteers, contractors and any person representing or acting on behalf of the CRCA in any capacity.

3.2. The policy includes a child-focused disclosure pathway for minors raising concerns. Where a disclosure raises a safeguarding concern, complaint, statutory reporting matter, Reportable Conduct Scheme matter or Police matter, the relevant CRCA safeguarding pathway also applies.

4. VALUES

4.1. The CRCA is committed to the following values so that the safety and well-being of all people remain at the forefront of decisions and actions.

4.1.1. **Scriptural teachings - upholding safety and dignity:** central to the Church's teaching is the call to embody love, mercy and justice. Colossians 3:17 calls all things to be done in the name of the Lord Jesus, and Luke 18:16 shows Jesus welcoming children and affirming their place in the kingdom. The responsibilities in this policy are therefore carried out in a way that honours the dignity, voice and safety of each person.

4.1.2. **Zero tolerance:** the CRCA has a zero-tolerance approach to abuse and harmful behaviour. The responsibilities in this policy must never be used to suppress, minimise or ignore concerns about safety, harm or abuse.

4.1.3. **Transparency and accountability:** the CRCA fosters a culture of openness, appropriate information sharing, feedback and accountable action.

4.1.4. **Shared responsibility:** safeguarding is everybody's responsibility and requires the participation of local churches, personnel, members and denominational safeguarding structures.

4.1.5. **Empowerment:** the CRCA supports people to understand their rights, speak up, raise concerns and contribute to the development of safer church environments.

4.1.6. **Integrity:** the CRCA fosters honest, ethical and respectful engagement at all levels of church life.

5. DEFINITIONS

5.1. Terms defined in the National Safeguarding Policy apply to this policy unless this section gives a more specific operational meaning.

5.2. **Disclosure** means information provided by a person about suspected misconduct, breach, safeguarding concern, unlawful conduct, systemic risk, or another matter that may require action under this policy or a related pathway.

5.3. **Discloser** means a person who makes a disclosure under this policy, whether identified or anonymous, and whether the disclosure is made locally, to the Safe Church Unit or through another recognised pathway.

5.4. **Good faith** means the discloser honestly holds the concern or information, even if later assessment does not substantiate every detail.

5.5. **Protected disclosure** means a disclosure that attracts protection under this policy or, where applicable, a statutory whistleblower-protection regime.

5.6. **Retaliation** means victimisation, intimidation, reprisal, disciplinary detriment, employment detriment, pastoral detriment, membership detriment or any adverse treatment because a person made or assisted with a disclosure.

5.7. **Disclosure recipient** means the person, role or body authorised or expected to receive, refer or escalate a disclosure under this policy.

5.8. **Anonymous disclosure** means a disclosure made without identifying the discloser, or without contact details that allow follow-up, and is triaged as far as available information permits.

5.9. **Child-focused disclosure pathway** means a process for receiving and responding to a disclosure made by a child or young person in a way that is age-appropriate, safe, supportive and attentive to the child's wishes and best interests.

6. POLICY

6.1. **Confidentiality:** Reports made under this policy are treated with confidentiality and discretion, subject to the limits of confidentiality. Confidentiality is not absolute where a statutory reporting duty, Reportable Conduct Scheme notification, Police direction, mandatory reporting obligation or lawful information-sharing pathway is engaged.

6.2. **Protection:** A person who makes a disclosure in good faith must not be subject to retaliation, victimisation, disciplinary detriment, employment detriment, pastoral detriment or membership detriment because they made the disclosure.

6.3. **Transparency:** Disclosures are handled fairly and transparently, with outcomes and actions based on a careful and impartial process.

6.4. **Support:** People who make disclosures are offered appropriate support, including information about pastoral, counselling, safeguarding, legal or independent support pathways where relevant.

6.5. **Statutory whistleblower protections:** Where a disclosure is protected under Part 9.4AAA of the Corporations Act 2001 (Cth) or another applicable statutory whistleblower-protection regime, those protections apply in addition to this policy.

6.6. **Parallel statutory reporting:** Where the disclosure concerns conduct that may be criminal, reportable conduct, a mandatory reporting matter, a notifiable data breach or another statutory matter, the relevant report or notification is made on its own timeframe and is not displaced by whistleblower handling under this policy.

7. PROCEDURES

7.1. **Secure disclosure channels:** Disclosures may be made through a confidential channel maintained by the CRCA, to the Safe Church Unit, or through another pathway recognised by this policy or applicable law. Where a disclosure is first raised locally, the person receiving it refers the matter through the appropriate safeguarding, complaints, whistleblower or governance pathway.

7.2. **Receipt of disclosure:** The recipient of the disclosure acknowledges receipt within five working days where contact details are available. The acknowledgement explains the expected process, the limits of confidentiality and any statutory pathway that may engage.

7.3. **Case management:** The disclosure recipient triages disclosures and coordinates the response pathway. Complex, high-risk or conflicted matters are escalated to the Safe Church Advisory Committee, or to an independent external safeguarding adviser where the Safe Church Advisory Committee itself is conflicted.

7.4. **Conflict of interest:** Where a disclosure concerns a person who holds an office, governance role or position of authority in the CRCA, the matter is escalated to a body whose composition is independent of that person.

7.5. **Investigation:** Investigations are conducted promptly, fairly and impartially. Where the matter is also a Police matter, internal processes are managed so they do not compromise Police action.

7.6. **Feedback and communication:** The person making the disclosure is kept informed of progress where possible, subject to confidentiality, legal restrictions and the safety of people involved.

7.7. **Support and protection:** The Safe Church Unit is available to provide safeguarding support and referral options. Where the discloser is a child or young person, the process is age-appropriate and considers the child's safety, wishes and best interests.

7.8. **Anonymous disclosures:** Anonymous disclosures are received and triaged on the same basis as identified disclosures, except that follow-up communication may not be possible.

8. ROLES AND RESPONSIBILITIES

8.1. Role definitions used in this policy are consistent across the CRCA policy suite.

8.2. **Session / Church Council:** The Session / Church Council supports local awareness of this policy and ensures that people in the local church understand that concerns may be raised in good faith without retaliation. Where a disclosure is first raised locally, the Session / Church Council ensures the matter is referred through the appropriate safeguarding, whistleblower, complaints or governance pathway.

8.3. **Safe Church Representative:** The Safe Church Representative may assist a person locally to understand the available reporting and disclosure pathways. The Safe Church Representative does not investigate whistleblower disclosures unless specifically authorised through the relevant CRCA governance pathway.

8.4. **Safe Church Administrator:** The Safe Church Administrator supports the administrative and records-management functions required by this policy. This may include maintaining approved disclosure-channel information, record templates, restricted registers, training records and central safeguarding documentation required by the CRCA safeguarding framework. The Safe Church Administrator may support secure record management for disclosures and related safeguarding matters but does not replace the local governance responsibility of the Session / Church Council, the response-support role of the Safe Church Unit, or the oversight role of the Safe Church Advisory Committee.

8.5. **Safe Church Unit:** The Safe Church Unit may receive and assist with triage of disclosures, provide advice on response pathways, and support escalation where a disclosure raises a safeguarding concern, complaint, statutory reporting matter, Reportable Conduct Scheme matter, Police matter, privacy matter or other issue requiring safeguarding response. The Safe Church Unit supports local churches and the Safe Church Advisory Committee but does not replace local church governance responsibility or determine final disciplinary or governance outcomes.

8.6. **Safe Church Advisory Committee:** provides oversight, high-risk review, review or escalation functions where allocated within delegated safeguarding authority, and may engage external expertise where required. The Safe Church Advisory Committee may advise on systemic issues, policy implications and safeguarding governance responses arising from disclosures. It does not amend, overturn or substitute decisions reserved to a Session / Church Council, Classis, Synod, employer, statutory authority, regulator, court, tribunal or other legally authorised decision-maker.

8.7. **All members:** All members act in good faith, report misconduct where appropriate, do not retaliate against people who make disclosures, and cooperate with processes carried out under this policy.

9. BREACHES

9.1. Breach of this policy, including retaliation against a person who makes a disclosure or participates in a process under this policy, is dealt with under the Disciplinary and Breach Response Policy and, where applicable, the CRCA Church Order and relevant statutory pathways.

10. RELATED POLICIES

10.1. National Safeguarding Policy; Safeguarding Governance and Leadership Policy; Code of Conduct; Complaints Handling Policy; Disciplinary and Breach Response Policy; Information Sharing and Record Keeping Policy; Privacy Policy; Continuous Quality Improvement Policy.

11. MONITORING AND REVIEW

11.1. This policy is reviewed every three years, or earlier where required by legislative change, regulator guidance, audit findings, serious incidents, a substantiated complaint, material safeguarding risk, or a decision of the Safe Church Advisory Committee. Feedback on this policy may be sent to the Safe Church Unit at scu@crca.org.au at any time.

External framework reference: National Principles for Child Safe Organisations.

Document	Control	History			
Version	Approval date	Effective date	Approved by	Author or review lead	Summary of changes
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0.2	09/07/2026	09/07/2026	SCAC	Align Safeguarding	Statuary updates
0.3	28/07/2026	28/07/2026	SCAC (SIC)	Align Safeguarding	SCAC feedback
1.0	16/09/2026	16/09/2026	SCAC (SIC)	Align Safeguarding	First approved issue.