

Whistleblower Policy

Section 1 – Background

At Generations in Jazz Inc. (Generations), we value high standards of trust, empathy and ethical conduct in all our dealings. We are committed to creating a work environment in which employees, committee/board members, volunteers, consultants and sub-contractors are able to raise concerns regarding unethical, unlawful or undesirable conduct or activities, in confidence and without fear of reprisal.

Section 2 – Scope

This policy extends to all employees, volunteers, sub-contractors and consultants or any other parties acting as representatives or agents of Generations. There may also be instances of external parties making disclosures to Generations and in these situations, the response of Generations will mirror this policy.

Section 3 - Purpose

The purpose of this policy is to:

- Set out the process to report concerns of possible Inappropriate Conduct in good faith, in confidence and without fear of reprisal, dismissal or discriminatory treatment.
- Provide an alternative avenue for raising concerns of Inappropriate Conduct (for example, by talking to a senior employee or team leader). This policy should be used in the case where you believe that the existing avenues have failed, or you perceive them as unsuitable.
- Ensure that inappropriate conduct is detected, addressed appropriately and prevented in the future.

Prompt action will be taken to investigate each report received to ensure Inappropriate Conduct is detected and addressed.

This Whistleblower Policy does not apply to grievances resulting from the performance review process, discrimination, harassment or bullying. These are dealt with under the [Grievance Resolution Procedure](#).

Section 4 – Inappropriate Conduct

Inappropriate Conduct means serious conduct which is, or potentially could be:

- Dishonest or corrupt
- Fraudulent
- Illegal, including theft, drug use/sale, violence or threatened violence and criminal damage to property
- A breach of a legal obligation
- A breach of a professional obligation
- Unsafe work practices
- In breach or disregard of the Generations policies
- Any other conduct that could cause loss to Generations or become detrimental to Generations or
- Any related or similar activity that could be considered by a reasonable employee to be inappropriate or unacceptable.

Section 5 - Reporting Inappropriate Conduct

In the first instance you should raise any concerns of inappropriate conduct with an immediate supervisor, a relevant Team Leader or with the CEO. However, if you feel that the existing avenues have failed, you perceive them as unsuitable or are unsatisfied with the response, you should use this policy as a confidential, alternative reporting avenue.

If this is the case, you should contact Generations designated Whistleblower Contact:

Details

Name and role

Telephone number

Mobile number

Email

Mail to

You may choose to identify yourself or remain anonymous. If you choose to remain anonymous, you must include sufficient information in the communication for the Inappropriate Conduct to be investigated.



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Investigations

Once the employee/team leader receives a notification about the inappropriate conduct, an investigation will be undertaken to determine whether there is evidence to support the matter raised and/or what further action, if any, is to be taken.

The investigation process will vary depending on the precise nature of the conduct being investigated. All investigations must be conducted in a manner that is fair, objective and affords natural justice to all people involved.

Feedback and Communication

Where possible, and assuming the Whistleblower is not anonymous, Generations will give periodic updates to the Whistleblower as to the progress of the investigation into the inappropriate conduct, subject to confidentiality considerations.

Maintaining Records

The CEO will keep complete and accurate records of a report of inappropriate conduct to the extent required by relevant laws and subject to safeguards that ensure their confidentiality.

Section 6 - The Whistleblower

Protected Disclosure

If you report inappropriate conduct in accordance with this policy, you will be protected under this policy from reprisal or repercussions from Generations as a result of reporting inappropriate conduct, as long as the disclosure is made in good faith and you have reasonable grounds for believing the information disclosed indicates such conduct.

Any allegations which prove to have been made maliciously or knowingly to be false or not in good faith will be investigated and viewed as a serious disciplinary offence.

No action will be taken against an employee where the report was made in good faith but no wrongdoing was identified.

Whistleblower confidentiality

The identity of the Whistleblower will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, including where it is required by law and where it is necessary to prevent or mitigate a serious threat to an employee's health and safety.

Whistleblower's who do not wish to disclose their identity may remain anonymous when reporting inappropriate conduct. However, anonymity may impede a swift or thorough investigation into the inappropriate conduct or the outcome of a subsequent prosecution.

Commitment to protecting the Whistleblower

Generations is committed to protecting Whistleblower's against actions taken against them for reporting inappropriate conduct. Generations does not tolerate reprisals, discrimination, harassment, intimidation or victimisation against a Whistleblower, their colleagues or family members. Such retaliatory action will be treated as serious misconduct and will be dealt with in accordance with Generations disciplinary policies.



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If the Whistleblower is implicated in the inappropriate conduct being reported, and co-operates with Generations investigation, the fact that he or she has reported inappropriate conduct in accordance with this policy may be a mitigating factor when determining any disciplinary action.

Section 7 – References

- [Code of Conduct](#)
- [Grievance Resolutions Procedure](#)