

confidentiality of the allegations of the complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation to remedy any violation of IPM's policies in compliance with legal obligations.

Possible outcomes after reporting a concern

IPM will not take any action harmful to any staff member who:

- f* Reports a complaint in good faith, pursuant to this guidance, to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant.
- f* Provides in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assists in any investigation conducted by IPM.
- f* Otherwise participates or assists in a proceeding filed or about to be filed. An individual who deliberately or maliciously provides false information may be subject to disciplinary action, up to and including termination of employment.

The following actions may be taken **after** investigation of the concern:

- f* Disciplinary action (up to and including termination) against the wrongdoer dependent on the results of the investigation; or
- f* Disciplinary action (up to and including termination) against the whistleblower if the claim is found to be malicious or otherwise in bad faith; or
- f* No action if the allegation proves unfounded

The whistleblower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally. A confidential record of the steps will be retained.

Frequently Asked Questions:

What is the difference between whistleblowing and making a complaint?

- f* In practical terms, whistleblowing occurs when a worker raises a concern about issues of misconduct or infractions of policies that affects the organization or others (e.g. staff or others). The person blowing the whistle is usually not directly, personally affected by the action. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistleblower should not be expected to prove their case; rather he or she raises the concern so others can address it. This is different from a complaint. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

Can concerns be raised confidentially or anonymously?

- f* Usually, the best way to raise a concern is to do so openly with senior management. Openness makes it easier for the Organization to assess the issue, work out how to investigate the matter, understand any motive and get more information. An individual raises a concern confidentially if he or she gives his or her name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if he or she does not give his or her name at all. Clearly, if the Organization does not know who provided the information, it is not possible to reassure or protect them.

What information should a whistleblower provide?

- f* Supporting evidence for the allegations, if available, is clearly helpful. Individuals should talk to the Chief Executive Officer (CEO) and/or Chair of the Finance Committee or