

**Alseasons Hospitality Staff**

**Policies & Procedures**

**2024**

****

**Updated 1st July 2024**

**Alseasons Hospitality Staff (Hereafter referred to as Alseasons) Policies and Procedures 2024 operate as an adjunct to the AHS Staff Handbook, Contract of Employment and WHS Manual**

Code of Conduct 3

Cultural Policy 5

Drug and Alcohol Policy 6

IT, Internet, Email & Social Media Policies 10

Recruitment and Selection Policy 17

Discrimination Policy 19

Gender Policy 27

Diversity and Inclusion Policy 30

Equal Employment Opportunity Policy 32

Sexual Harassment Policy 35

Respect at Work Policy 38

Environmental Policy 42

Performance and Development Policy 43

Workplace Grievance Policy 55

Quality Statement 63

Privacy Policies 64

Alseasons Whistle-blower Policy 67

Modern Slavery Policy 82

# Code of Conduct

**OVERVIEW**

**OVERVIEW**

At Alseasons Hospitality Staff (“Alseasons”) we require that all of our employees conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our clients, colleagues and other people. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.
This code establishes the standards of behaviour that must be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notiﬁed.

**OPERATION**

The purpose of this policy is to make it clear what Alseasons expects from employees, and employees are required to be familiar with and comply with the terms of this policy at all times. Failure to do so may result in disciplinary action, including potentially termination of employment.
In so far as this policy imposes any obligations on Alseasons, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes beneﬁts and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. They set the terms and conditions of employment that are intended to be contractual out in an employee’s written employment contract.
Alseasons may unilaterally introduce, vary, remove or replace this policy at any time.

**STANDARDS OF CONDUCT**

The standards expected of employees include:

* Compliance with all Alseasons and workplace policies, procedures, rules, regulations and contracts;
* Compliance with all laws;
* Compliance with all reasonable and lawful instructions given by or on behalf of Alseasons;
* Devotion of the employee’s entire time, attention and skill during normal working hours and at other times as reasonably necessary for the employee to perform their duties;
* To be honest and fair in dealings with customers, clients, co-workers, Alseasons management and the general public, and to treat them with courtesy and respect;
* To be faithful and diligent, and actively pursue the Alseasons’ best interests at all times;
* To work in a safe and compliant manner, and to observe all workplace health and safety rules and responsibilities; Refraining from any discriminatory, bullying or harassing behaviour toward customers, clients, co-workers, company management and the general public;
* To not make any statements to the media about Alseasons’ business, unless expressly authorised to do so by Alseasons;
* To not make any statements about Alseasons on social media, or any other public platform, that may harm the Alseasons’ reputation;
* To not, in connection with the employee’s employment, accept any ﬁnancial or other beneﬁt from any entity other than Alseasons – unless acceptance of such beneﬁt is in accordance with Alseasons’ other workplace policies or is otherwise disclosed to Alseasons and expressly permitted by Alseasons;
* To not engage in any employment or provide any services to any person or entity other than Alseasons, except with Alseasons’ prior written consent;
* To not engage in any employment or provide any services to a supplier or competitor of Alseasons, except with Alseasons’ prior written consent;
* Immediately disclosing any potential, perceived or actual conﬂict of interest (whether direct or indirect) that may give rise to a conﬂict with the performance of the employee’s obligations to Alseasons, or the Alseasons’ business, conﬁdential information or reputational interests. Alseasons may direct employees to take action to eliminate or reduce any such conﬂict, and employees must comply with such directions;
* To not engage in conduct, whether during or after work hours, that in the opinion of Alseasons causes damage or potential damage to Alseasons’ property or reputation;
* To not use, or come to work while aﬀected by use of prohibited drugs or alcohol;
* To not discriminate on the basis of personal characteristics including (but not limited to) sex, race, disability, pregnancy, age, marital status or sexual orientation;
* To ensure and maintain punctuality;
* To dress in an appropriate manner and to ensure that appearance is presentable, clean, neat and tidy (including but not limited to wearing any uniform that is required of you by Alseasons);
* To not use Alseasons’ internet to access and/or download sexually explicit material or other oﬀensive material;
* To not use Alseasons email to send sexually explicit or suggestive material, or other oﬀensive or harassing material;
* To maintain both during employment and after termination of employment with Alseasons, the conﬁdentiality of any conﬁdential information, records or other materials acquired during the course of employment;
* At all times, behave in a way that upholds the Alseasons’ core values and the integrity and good reputation of Alseasons;
* Reporting any conduct of other workplace participants which is in breach of any of the above, or potentially in breach of any of the above, without delay.

# Cultural Policy

In accordance with our mission statement and philosophy, Alseasons is committed to employing exceptional talent and providing outstanding customer care.

Our culture fosters respect, collaboration, innovation and productivity.

**Our Team**

We have created a distinctive culture that supports adaptability, celebrates diversity, sets goals and exceeds expectations.

We manage people in a way that will allow them to exercise their full potential through open communication and opportunities to learn and grow.

We recruit a diverse team that support and share the values and goals of Alseasons.

To keep up with an agile climate we want our team to embrace change and be thrilled to drive it.

Our culture embraces teamwork, initiative taking and problem solving that cultivates employee engagement and empowers our team.

Our goal is to encourage an environment, which promotes our team to develop themselves through various channels including development plans, training courses, webinars and coaching opportunities.

The most important job of our managers is to guide, support, empower and challenge our people to be high achievers.

**Effective communications channels**

It is important that our decision-making systems and protocols are clear and communicated widely.

Our weekly and monthly and toolbox meetings are paramount; they contain information about the company, on-going training and updates. Team contributions are valued and essential in these forums. Our meeting notes are stored in shared documents and should be reviewed on a regular basis.

Open emails with information on Alseasons, clients and staff should be shared regularly, everyone should be on the information page so they stay in the loop and can comment openly and freely.

We operate with the leanest possible set of policies, procedures, rules and approvals, because most of these top-down mandates hamper speed and agility.

We want and need all staff to understand not only the particular tasks they are assigned and the team mission to provide the best service and talent, but also the larger story of the way the business works, the challenges and opportunities the company faces and the competitive landscape.

We want communication between management and the team to genuinely flow both ways, so we openly encourage questions and suggestions.

# Drug and Alcohol Policy

We recognise that alcohol and other drug use, whether it occurs in or away from the workplace, becomes a work health and safety issue, if a worker’s ability to exercise judgment, coordination, motor control, concentration and alertness at work is impaired. Workers adversely affected by the use of alcohol and other drugs can pose a risk to themselves and others in the workplace.

Alseasons is committed to providing a safe workplace and ensuring the health and safety of all workers and others in the workplace, as such, the Company will identify stressors in the workplace setting, including working conditions and aspects of the workplace culture that may contribute to or exacerbate potentially harmful alcohol and drug use.

**Objectives**

The objectives of this policy are to provide for:

* a safe and healthy workplace;
* well organised, adequately supervised work that workers find challenging and rewarding;
* appropriate support to help with problems or pressures at work;
* restricted access to alcohol and other drugs at work;
* a clear and well publicised alcohol and other drug policy that applies to all workers, including on-hire workers; and
* the necessary information, instruction and training to workers to enable them to perform their work safely.

**Scope**

This policy applies to all workers including employees, on-hire workers and contractors. The Policy applies to all workers whilst at any workplace of the Company and any other place where the worker performs work for the business.

**Responsibilities**

It is the Alseasons responsibility to:

* Provide information on drug and alcohol use to help ensure that all workers are aware of the issues associated with the use of alcohol and other drugs and how this may impact on health and safety in the workplace.
* If necessary, conduct a risk assessment in consultation with workers to identify external and external conditions, the appropriate nature and content of this policy, and suitable strategies for implementation.
* Identify stressors in the workplace setting that may contribute to or exacerbate potentially harmful alcohol and drug use.
* Develop and regularly review the Alcohol and Other Drug Policy through an open process that seeks input from workers, their representatives, or Health and Safety Representatives (HSRs).
* Ensure the Alcohol and Other Drug Policy is distributed to all workers and others in the workplace, and ensure it is readily available.
* Provide information, instruction and training to workers on the content and operation of the Company’s alcohol and other drugs policy;
* Provide specific training for managers, supervisors and HSRs about how to identify workers affected by alcohol or other drugs, how to manage associated risk, and their specific responsibilities under the Alcohol and Other Drugs Policy;
* Direct any worker reasonably suspected of being under the influence of drugs or alcohol away from the work area;
* Arrange for a safe option of transport home for any worker under the influence of drugs or alcohol;
* Request workers to see a medical practitioner if it is reasonably suspected that they are under the influence of drugs or alcohol;
* Provide information regarding counselling, treatment and rehabilitation services available in the workplace and contact details for services available externally;
* Enacting Company disciplinary procedures for those workers whose work performance indicates there may be a problem with the use of alcohol and/or other drugs.

**Officer Responsibilities**

**Officers** are responsible for exercising due diligence, by taking reasonable steps:

* to keep abreast of work health and safety requirements and matters;
* to gain an understanding of the operational risks, including alcohol and other drugs;
* to ensure the company has appropriate resources to effectively prevent and manage the risks associated with alcohol and other drugs in the workplace;
* to ensure the company has adequate processes in place to gather and consider information regarding alcohol and other drugs risks and incidents and responding to those in a timely and effective manner;
* to ensure the company implements, monitors and verifies the effectiveness of processes for complying with duties of the company under the relevant health and safety legislation.

**Manager Responsibilities**

**Managers** are responsible for taking all practical measures to ensure that:

* Workers are aware of this policy;
* This policy and associated procedures are implemented and complied with in their areas of control;
* Work performance issues that may be associated with alcohol and drugs are identified and addressed;
* The worker is directed to cease work activities immediately and details provided with respect to support options, if the manager considers that someone is adversely affected by alcohol or other drugs, to the extent that they are a risk to themselves or others,
* Report incidents and concerns associated with behaviour, actions, or conduct in breach of this policy;
* Investigate and document reports associated with breaches of this policy.

**Operational Workers and On-Hire Workers Responsibilities**

**Operational workers and on-hire workers** are responsible for:

* Understanding and complying with this policy;
* Ensuring their own and others health and safety is not affected by their actions
* Attend work fit for duty;
* Consult with management if they believe they are not fit for work due to the effects of alcohol or other drugs;
* Reporting all incidents including unsafe work practices, hazards, near misses and injuries.

**Clients and Visitor Responsibilities**

**Clients and visitors** are responsible for:

* ensuring that their actions or failure to act does not put themselves or our workers health and safety at risk;
* following any reasonable instructions that we may give to ensure their health and safety and the health and safety of others in the workplace.

Alseasons Hospitality Staff encourages all its workers to discuss any prescription drugs they are taking with their doctor to determine whether use of the drug will impair their ability to operate tools, machinery or equipment or carry out work tasks. The Company also encourages workers to consult with their manager at an early stage, to ensure that the Worker is capable of performing their work tasks whilst taking the prescribed drugs.

Managers of the Company are expected to monitor their own reports, and to investigate situations that may breach this policy. Appropriate steps should be taken to deal with the Worker if the Manager suspects that a Worker behaviour, actions or conduct suggest that they have breached this policy.

**Worker Assistance**

If a worker thinks they have an alcohol or drug problem that is affecting their ability to perform the inherent requirements of their role, Alseasons encourages workers to ask for help from HR manager at an early stage (that is, before the problem is the subject of disciplinary action), without fear of punishment. Such discussions will be kept confidential.

At the company’s own discretion, it may provide a worker with access to a Worker Assistance Program (“EAP”), through an appropriate EAP provider. The purpose of the EAP is, amongst other things, to assist workers who voluntarily seek help for alcohol and/or drug dependence problems. Participation by any worker in the EAP will be regarded as confidential.

**Alcohol & Drug Testing**

During employment or engagement, Alseasons may require a worker to undergo a drug and alcohol test to monitor compliance with this policy.

**Policy Breaches**

Alseasons will not tolerate the illegal possession, distribution or consumption of any drug, nor will it condone harassment, unacceptable or unlawful behaviour that may result from the consumption of alcohol and/or drugs. Where observed Alseasons will report all illegal activity, including consumption, possession or distribution of an illegal substance to the appropriate authorities (e.g., the police)

Any worker who is found to have breached this policy may be subject to disciplinary action, up to and including the termination of employment or engagement.

# IT, Internet, Email & Social Media Policies

This is the official policy of Alseasons Hospitality Staff Pty Ltd and provides guidance for employees and external contractors on their professional and personal use of social media.

Depending on the circumstances, non-compliance with this policy may constitute a breach of employment or contractual obligations, misconduct sexual harassment, discrimination, or some other contravention of the law.

**Internet Use**

The Internet is provided by Alseasons for Alseasons use. Limited private use is permitted if the private use does not interfere with a person’s work and that inappropriate sites are not accessed e.g. pornographic, gambling. Management has the right to access the system to check if private use is excessive or inappropriate.

Failure to comply with these instructions is an offence and will be subject to appropriate investigation. In serious cases, the penalty for an offence, or repetition of an offence, may include dismissal. Staff need to be aware that some forms of Internet conduct may lead to criminal prosecution.

**Email Use**

1. Email facilities are provided for formal Alseasons correspondence.
2. Take care to maintain the confidentiality of sensitive information. If emails need to be preserved, they should be backed up and stored offsite.
3. Limited private use of email is allowed if it doesn’t interfere with or distract from an employee’s work. However, management has the right to access incoming and outgoing email messages to check if an employee’s usage or involvement is excessive or inappropriate.
4. Non-essential email, including personal messages, should be deleted regularly from the ‘Sent Items’, ‘Inbox’ and ‘Deleted Items’ folders to avoid congestion.
5. All emails sent must include the approved Alseasons disclaimer and logo.

To protect Alseasons from the potential effects of the misuse and abuse of email, the following instructions are for all users:

1. No material is to be sent as email that is defamatory, in breach of copyright or Alseasons confidentiality, or prejudicial to the good standing of Alseasons in the community or to its relationship with staff, customers, suppliers and any other person or Alseasons with whom it has a relationship.
2. Email must not contain material that amounts to gossip about colleagues or that could be offensive, demeaning, persistently irritating, threatening, discriminatory, involves the harassment of others or concerns personal relationships.
3. The email records of other persons are not to be accessed except by management (or persons authorised by management) ensuring compliance with this policy, or by authorised staff who have been requested to attend to a fault, upgrade or similar situation. Access in each case will be limited to the minimum needed for the task.
4. When using email a person must not pretend to be another person or use another person’s computer without permission.
5. Excessive private use, including mass mailing, “reply to all” etc. that are not part of the person’s duties, is not permitted.
6. Failure to comply with these instructions is a performance improvement offence and will be investigated. In serious cases, the penalty for breach of policy, or repetition of an offence, may include dismissal.

This policy also applies to all employees, contractors and sub-contractors of Alseasons who:

* Have an active profile on a social or Alseasons networking site such as LinkedIn, Facebook, MySpace or Twitter;
* Write or maintain a personal or Alseasons’ blog; and/or
* Post comments on public and/or private web-based forums or message boards or any other Internet sites.

This policy does not form part of an employee’s contract of employment. Nor does it form part of any contractor or sub-contractor’s contract for service.

**Professional use of Social Media**

Alseasons expects its employees to maintain a certain standard of behaviour when using social media for work or personal purposes.

This policy applies to all employees, contractors and sub-contractors of Alseasons

who contribute to or perform duties such as:

* Maintaining a profile page for Alseasons on any social or Alseasons networking site (including, but not limited to LinkedIn, Facebook, MySpace or Twitter);
* Making comments on such networking sites for and on behalf of Alseasons;
* Writing or contributing to a blog and/or commenting on other people’s or Alseasons’ blog posts for and on behalf of Alseasons; and/or
* Posting comments for and on behalf of Alseasons on any public and/or private web-based forums or message boards or other Internet sites.

**Procedure**

No employee, contractor or sub-contractor of Alseasons is to engage in social media as a representative or on behalf of Alseasons unless they first obtain Alseasons’ written approval.

If any employee, contractor or sub-contractor of Alseasons is directed to contribute to or participate in any form of social media related work, they are to act in a professional manner at all times and in the best interests of Alseasons.

All employees, contractors and sub-contractors of Alseasons must ensure they do not communicate any:

* Confidential Information relating to Alseasons or its clients, Alseasons partners or suppliers;
* Material that violates the privacy or publicity rights of another party; and/or
* Information, (regardless of whether it is confidential or public knowledge), about clients, Alseasons partners or suppliers of Alseasons without their prior authorisation or approval to do so; on any social or Alseasons networking sites, web-based forums or message boards, or other internet sites.

Confidential Information includes any information in any form relating to Alseasons and related bodies, clients or Alseasons, which is not in the public domain.

**Private/Personal use of Social Media**

**Procedure**

Alseasons acknowledges its employees, contractors and sub-contractors have the right to contribute content to public communications on websites, blogs and Alseasons or social networking sites not operated by Alseasons. However, inappropriate behaviour on such sites has the potential to cause damage to Alseasons, as well as its employees, clients, Alseasons partners and/or suppliers.

For this reason, all employees, contractors and sub-contractors of Alseasons must agree to not publish any material, in any form, which identifies them as being associated with Alseasons or its clients, Alseasons partners or suppliers.

All employees, contractors and sub-contractors of Alseasons must also refrain from posting, sending, forwarding or using, in any way, any inappropriate material including but not limited to material which:

* Is intended to (or could possibly) cause insult, offence, intimidation or humiliation to Alseasons or its clients, Alseasons partners, staff or suppliers;
* Is defamatory or could adversely affect the image, reputation, viability or profitability of Alseasons, or its clients, Alseasons partners or suppliers; and/or
* Contains any form of confidential Information relating to Alseasons or its clients, Alseasons partners or suppliers.

All employees, contractors and sub-contractors of Alseasons must comply with this policy. Any breach of this policy will be treated as a serious matter and may result in disciplinary action including termination of employment or (for contractors and sub-contractors) the termination or non-renewal of contractual arrangements.

Other disciplinary action that may be taken includes, but is not limited to, issuing a formal warning, directing people to attend mandatory training, suspension from work duties.

For the purposes of this policy, the following definitions apply:

Social media includes all internet-based publishing technologies. Most forms of social media are interactive, allowing authors, readers and publishers to connect and interact with one another. The published material can often be accessed by anyone. Forms of social media include, but are not limited to, social or Alseasons networking sites (i.e., Facebook, LinkedIn), video and/or photo sharing websites (i.e. YouTube, Flickr), Alseasons/corporate and personal blogs, micro-blogs (i.e. Twitter), chat rooms and forums and/or social media:

**Social Media**

  

We really appreciate it when you contribute to our community forums, hubs, blogs and websites. Your experiences, feedback, expertise and improvement suggestions are an excellent way for us to connect with you our team and clients.

To help our Facebook etc. look vibrant, all comments are reviewed and subject to the following ground rules.

Sometimes we will have to moderate the content. We welcome all feedback, both positive and negative, but it will sometimes be necessary to moderate (review, approve or remove) content without your prior agreement on our social media sites. The decision to moderate content will be at Alseasons absolute discretion but may be based on the factors including, but not limited to, the following criteria:

* Never give out personal or private information online - No private or confidential information may be disclosed. This includes, but isn't limited to - personal information etc. As you can imagine, we take the privacy of our staff and clients very seriously.
* No inappropriate content or personal attacks. Don't post denigrating, disrespectful, offensive, obscene, threatening or abusive material.
* Participation needs to be relevant to what we are and do and are about. We will remove content that is unrelated to the topic and any content that repetitively talks to the same subject, i.e., flame-wars, personal agendas, etc. We will also remove any content that solicits sales, or which appear to be for personal, political or commercial gains.
* Any material which is illegal, misleading or deceptive, which may infringe a third party's intellectual property rights, or which may in any way present a risk to Alseasons will be removed.
* Be courteous and respectful to the reader. Please try to refrain from shouting (ALL CAPS), excessive use of slang, and misrepresenting yourself to others. Good manners are as important online as they are anywhere else.
* We reserve the right (where the social media channel allows) to block users from our social media channels and blogs at our sole discretion, without notice.
* All contributors should be transparent.
* We will not misrepresent you or post false and misleading information.
* We will try to answer questions and contribute to the discussion, but some forums and discussion boards are not meant for customer service or complaints handling. Sometimes we will redirect contributors to appropriate channels such as direct email.

**Internet and Email**

We need to reduce the threat of hackers and security that can make Alseasons vulnerable, which in turn could shut down our systems and cause great harm to the business. Therefore, it is important that junk or spam email is dealt with and overseen by management and marked as spam before deleting. Risky and or unknown links must not be opened or forwarded to another internal email address.

**Downloads and Internet usage**

Use of the Internet by employees of is permitted and encouraged where such use supports the goals and objectives of the business. However, access to the Internet is a privilege and all employees must adhere to the policies concerning Computer, Email and Internet usage. Violation of these policies could result in disciplinary and/or legal action leading up to and including termination of employment. Employees may also be held personally liable for damages caused by any violations of this policy

##

**Computer, email and Internet usage**

Staff are expected to use the Internet responsibly and productively. Internet access is limited to job-related activities only and personal use is not permitted.

Job-related activities are allowed, this may include research and educational tasks that may be found via the Internet that would help in our role.

All Internet data that is composed, transmitted and/or received by our computer systems are considered to belong to the company and are recognized as part of its official data. It is therefore subject to disclosure for legal reasons or to other appropriate third parties.

The equipment, services and technology used to access the Internet are the property of Alseasons and the company reserves the right to monitor Internet traffic and monitor and access data that is composed, sent or received through its online connections.

Emails sent via the company email system should not contain content that is deemed to be offensive. This includes, though is not restricted to, the use of vulgar or harassing language/images.

All sites and downloads may be monitored and/or blocked by Alseasons if they are deemed to be harmful and/or not productive to business.

Some installation of software may not be approved by Alseasons and prohibited and therefore Management authority is expired before such installation.

**Unacceptable use of the Internet by staff includes, but is not limited to:**

* Sending or posting discriminatory, harassing, or threatening messages or images on the Internet or via Alseasons email service
* Using computers to perpetrate any form of fraud, and/or software, film or music piracy
* Stealing, using, or disclosing someone else's password without authorisation
* Downloading, copying or pirating software and electronic files that are copyrighted or without authorisation
* Sharing confidential material, trade secrets, or proprietary information outside of the organisation
* Hacking into unauthorised websites
* Sending or posting information that is defamatory to Alseasons, its products/services, colleagues and/or customers
* Introducing malicious software onto the company network and/or jeopardising the security of the organisation's electronic communications systems
* Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities
* Passing off personal views as representing those of the organization

If an employee is unsure about what constituted acceptable Internet usage, then you should ask Management for further guidance and clarification.

All terms and conditions as stated are applicable to all staff network and Internet connection. All terms and conditions as stated in this policy reflect an agreement of all parties and should be governed and interpreted in accordance with the policies and procedures mentioned above. Any user violating these policies is subject to disciplinary actions deemed appropriate by Alseasons

**User compliance**

You must understand that should you contravene this policy, your access privileges may be revoked, disciplinary action and/or appropriate legal action may be taken if necessary.

# Recruitment and Selection Policy

**Purpose**

Recruitment opportunities should be filled by suitable candidates. This policy aims to support this objective by providing guidance to those responsible for recruiting and selecting staff about:

1. Ensuring the decision to recruit and select is properly authorised;
2. Ensuring appropriate recruitment and selection procedures are followed;
3. Maintaining appropriate confidentiality; and
4. Meeting all legislative requirements.

**Scope**

This policy applies to the recruitment, selection and appointment of casual, temporary (fixed term or fixed task), part time and full-time employees.

**Definitions**

Recruitment means obtaining potential candidates with the desired knowledge, skills and experience to fill job vacancies for consideration against defined position descriptions and specifications.

Selection means choosing the most appropriate candidate/s through a process including but not limited to interviewing, reference checking and testing.

**Responsibilities**

Managers/supervisors who are responsible for the recruitment, selection and appointment of any person within the organisation must ensure the decision to recruit and select is properly authorised. This includes:

* Obtaining appropriate authority for the type of employment to be offered (including duration), the employment terms and conditions, the appropriate method for filling a position (including the type and cost of any advertising), if required, the engagement of external consultants, and the appointment of a person to any position.

Managers/supervisors who are responsible for the recruitment, selection and appointment of any person within the organisation must also ensure appropriate recruitment and selection procedures are followed. This includes:

* Where appropriate, a job analysis has been completed and there is an approved position description;
* The appropriate pay and conditions criteria for potential employees have been identified;
* Where jobs are filled through competitive selection, an approved selection process has been applied that assesses applicants based on job related criteria, complies with any relevant legislation, and also ensures appropriate privacy and confidentiality of applicants;
* Prior to a verbal or written job offer being made all relevant details of a preferred applicant have been checked and verified (including work history, qualifications and licences), any statutory or other pre-employment checks (including medical checks and references) have been conducted, and approval has been obtained for a job offer and its terms and conditions;
* Where necessary, appropriate notifications have been provided to unsuccessful applicants;
* Prior to the commencement of employment, any necessary records for a new employee have been obtained; and,
* Appropriate records of the process have been compiled and stored securely and confidentially.

Managers/supervisors who are responsible for the recruitment, selection and appointment of any person within the organisation must ensure appropriate confidentiality is maintained. This includes:

* Not disclosing the names and contact details of unsuccessful applicants without their permission (unless permitted or required by law).

# Discrimination Policy

**EEO, Discrimination, Bullying, Harassment and Violence Policy**

Alseasons Hospitality Staff (“Alseasons”) supports equal employment in the workplace and eliminating unlawful discrimination, bullying, harassment and violence in the workplace. We are committed to providing all workers with a healthy and safe work environment free from inappropriate behaviour. This policy is intended to provide managers and workers with information to help Alseasons achieve its policy objectives by outlining expectations of behaviour and procedures for dealing with complaints.

We expect all workers to behave in a professional manner and to treat each other with dignity and respect when they are at work. We encourage all workers who experience inappropriate behaviour such discrimination, bullying, harassment or violence to report it. When inappropriate behaviour is reported, it will be seen as a serious matter and will be investigated in a timely manner.

**Scope of Policy**

The EEO, Discrimination, Bullying, Harassment and Violence Policy is applicable to all employees, contractors, volunteers, interns and consultants (“workers”).

Workers must comply with this policy at all times during work (including outside of ordinary working hours), or when representing or acting on behalf of Alseasons at work related events and social functions. This policy also applies where there is a relevant connection to the workplace or where there is a significant effect on the workplace (e.g., posting a discriminatory message about an employee or customer on a social media platform).

**Policy**

Behaviour that is inconsistent with this policy will not be tolerated and may result in disciplinary action up to and including termination of a Worker’s employment or engagement.

Where a worker is working for clients, they must comply with the client’s policies relating to discrimination, bullying, harassment and violence. Behaviour that is inconsistent with a client’s policy will not be tolerated and may result in disciplinary action which may include termination of assignment and/or termination of employment with Alseasons.

**Equal Employment Opportunity**

It is the policy of Alseasons that all persons in the workplace be treated on the basis of merit and according to their skills and abilities. This shall include, but is not limited to, matters involving:

* recruitment, selection, transfers, promotions, performance reviews, training and development, supervision and management of staff, counselling, disciplinary procedures and termination of employment; and
* remuneration practises and benefits.
* A worker’s gender, marital status, pregnancy, parental or family responsibilities, race, age, physical or mental disability, sexual orientation, transgender, political or religious beliefs, social origin, trade union activity or inactivity, or any other attribute prohibited by law, will not form the basis of employment or engagement decisions.

**Discrimination and Harassment**

Alseasons believes that all staff members have a right to work in a productive environment in which discriminatory conduct or harassment of others is not tolerated.

Through reasonable management, Alseaosons will endeavour to prevent discrimination and harassment from occurring in the workplace.

All forms of harassment and unlawful discrimination can have many negative effects in the workplace. Workers who are subjected to, or witness this type of treatment often feel intimidated or anxious at work.

**What is Unlawful Discrimination?**

Unlawful discrimination may occur when a worker is treated less favourably than others because of that Worker’s individual characteristics or because that person belongs to a particular group of people. Everyone should feel comfortable in the workplace and individual differences should be respected.

Discrimination does not have to be intentional to be unlawful. The intention of the person discriminating is irrelevant. Two types of discrimination can occur in the workplace:

**Direct Discrimination**- this occurs when an individual treats another person less favourably for an unlawful reason.

**Indirect Discrimination**- this occurs when a policy or practise appears neutral but in fact results in an individual or group being treated less favourably.

* Employment decisions may be unlawful if they are made on the basis of a person’s:
* gender (including marital status, pregnancy or potential pregnancy or transgender status);
* race (including colour, descent, nationality, ethnic or ethno-religious origin);
* sexuality (including sexual orientation);
* age;
* marital status;
* family or carer’s responsibilities;
* pregnancy and breastfeeding;
* religion
* political opinion/activities;
* irrelevant criminal records;
* disability, disease or injury;
* industrial activity (including trade union activity or non-activity); or
* an association with someone who has, or is assumed to have one of these characteristics.

**Examples of Unlawful Discrimination**

The following examples may constitute unlawful discrimination in the workplace:

* a pregnant employee being pressured to resign prior to taking any maternity leave; or
* making the decision not to hire an employee on the basis of the person's ethnicity.
* It is illegal to discriminate on the basis that a person is perceived to have one of the above attributes, even if they do not actually have that attribute. For example, it is illegal to discriminate against a person because you think that the person has a disability, even if they do not in fact have the disability.

**What is Harassment?**

Harassment is any unwelcome or uninvited behaviour that is based on one of the unlawful reasons that a reasonable person would anticipate might offend, humiliate or intimidate another person, whether or not that effect is intended.

Harassment may occur as a single act, or as a series of incidents, persistent innuendoes or threats. It can take many forms- it may be silent or loud, subtle or openly hostile, private or public.

Harassment may take the form of general bullying, or be specifically aimed at people with particular individual attributes and characteristics. This latter type of harassment may amount to unlawful discrimination.

**Sexual Harassment**

Sexual harassment in the workplace generally includes any unwelcome conduct of a sexual nature which a reasonable person would find offensive. It may be physical, verbal or written.

Certain conduct that may be tolerated in social situations could constitute sexual harassment in the workplace when it is unwelcome. At the same time, sexual harassment must not be confused with conduct that has the consent of all involved. Behaviour that is based on mutual attraction, friendship and respect is not likely to constitute sexual harassment as long as the interaction is consensual and reciprocated.

Sexual harassment is considered as serious misconduct and will not be tolerated by Alseasons under any circumstances.

Alseasons is committed to maintaining a working environment which is free from sexual harassment. Alseasons regards sexual harassment as a serious issue and endeavours to treat any complaints in a sensitive, fair and confidential manner.

**Examples of Sexual Harassment**

The following examples may constitute sexual harassment when they are offensive to a staff member, regardless of any innocent intent on the part of the offender:

* the public display of pornography, including on the Internet;
* continued use of jokes containing sexual innuendo;
* intrusive enquiries into another worker’s private life, their sexuality or physical appearance;
* persistent requests from a colleague to go for a drink where such requests have been consistently declined;
* persistent staring or leering at a person or parts of their body;
* sexually offensive telephone calls or text messages;
* requests for, or expectations of, sexual activity under threat, or in exchange for favours or promises of preferential treatment;
* deliberate or unnecessary physical contact, such as groping, patting, pinching, fondling, deliberate brushing up against another body, or attempts at kissing;
* public displays of nudity - commonly referred to as flashing; or
* sexual violence at the most extreme, sexual assault and forced attempts at sexual intercourse.

**Victimisation**

Victimisation occurs when a person is treated detrimentally by others because they have lodged a discrimination or harassment complaint or takes certain related actions.

Victimisation of others is unlawful. The intention of such protective measures is to ensure that a person who wants to use or does use their statutory rights to protect themselves against discrimination or harassment, is not further disadvantaged by other detriments being imposed on them.

Disciplinary action will be taken against a Worker who is found to have engaged in threatening, intimidating or other inappropriate behaviour against a person who has complained of harassment up to and including termination of the employment or engagement of a worker.

**Bullying**

Workplace bullying is repeated, unreasonable behaviour directed towards a person, or a group of persons, that causes a risk to health and safety. For the purposes of this policy, the following are defined:

* **Repeated behaviour** refers to the persistent nature of the behaviour and can refer to a range of behaviours over time.
* **Unreasonable behaviour** means behaviour that a reasonable person, having regard to the circumstances, may see as unreasonable, for example because the behaviour is victimising, humiliating, undermining or threatening.
* **Risk to health and safety** means that the bullying behaviour must be repeated, unreasonable and cause a risk to health and safety. ‘Health’ includes both physical and psychological health.

Bullying may be direct or indirect and may include, but is not limited to:

*Direct Bulling:*

* abusive, insulting or offensive language;
* spreading misinformation or malicious rumours;
* behaviour or language that frightens, humiliates, belittles or degrades, including over criticising, or criticism that is delivered with yelling or screaming;
* displaying offensive material;
* teasing or regularly making someone the brunt of pranks or practical jokes;
* interfering with a person's personal property or work equipment;
* harmful or offensive initiation practices.

*Indirect Bullying:*

* unreasonably overloading a person with work or not providing enough work;
* setting timelines that are difficult to achieve or constantly changing deadlines;
* setting tasks that are unreasonably below or beyond a person’s skill level;
* deliberately excluding, isolating or marginalising a person from normal work activities;
* withholding information that is vital for effective work performance;
* deliberately denying access to information, consultation or resources;
* deliberately changing work arrangements, such as rosters and leave, to inconvenience a particular person;
* unfair treatment in relation to accessing workplace entitlements such as leave or training.

**What is not bullying**

Many things that happen at work are generally not considered to be bullying, although some experiences can be uncomfortable for those involved. Differences of opinion, performance management, conflicts and personality clashes can happen in any workplace, but do not necessarily result in bullying.

Reasonable management of workers carried out in a reasonable manner is not bullying. Managers have the right, and should, manage their staff. This includes directing the way in which work is performed, undertaking performance reviews and providing feedback (even if negative) and disciplining and counselling staff. According to Safe Work Australia, examples of reasonable management action include:

* setting reasonable performance goals, standards and deadlines in consultation with workers and after considering their respective skills and experience;
* allocating work to a worker in a transparent way;
* fairly rostering and allocating working hours;
* transferring a worker for legitimate and explained operational reasons;
* deciding not to select a worker for promotion, following a fair and documented process;
* informing a worker about unsatisfactory work performance in a constructive way and in accordance with any workplace policies or agreements;
* informing a worker about inappropriate behaviour in an objective and confidential way;
* implementing organisational changes or restructuring, and
* performance management processes.

**Violence**

A worker may be exposed to work-related violence as a victim or witness to a violent incident.

Work-related violence is any incident in which a person is abused, threatened, or assaulted in circumstances relating to their work. Violence at work can come from a member of the public, a customer or even a colleague.

The term ‘work-related violence’ covers a broad range of actions and behaviours that can create a risk to workers’ health and safety, such as:

* verbal threats;
* threatening someone with a weapon;
* throwing objects;
* pushing, shoving and hitting;
* spitting and biting;
* sexual abuse.

There will be no tolerance of violence. All incidents of violence and aggression will be reported and investigated. All causes will be identified, and appropriate action taken to prevent it happening again. If any Worker is found to have been violent to another person within the workplace, the worker may be subject to disciplinary action including termination of a worker’s employment or engagement.

**Responsibilities**

Alseasons has a duty of care to its staff members to take reasonable steps to prevent unlawful harassment, bullying and discrimination.

Managers and supervisors have a responsibility to:

* comply with this policy;
* monitor the working environment to ensure that acceptable standards of conduct are observed at all times;
* model appropriate behaviour;
* ensure that all employment, advancement and training decisions are consistent with this policy;
* seek appropriate advice and assistance when dealing with formal or informal complaints.
* All workers have a responsibility to:
* comply with this policy;
* co-operate with the Company in the event of an investigation;
* when appropriate, deal with sensitive information in a confidential manner.

**What if you have a Complaint**

Workers who become aware of a breach or suspected breach of this policy are encouraged to discuss this matter with their manager on a confidential basis.

In instances of any alleged policy breach, discretion is important to protect all people concerned. All workers are required to observe confidentiality of complaints of which they become aware. Should you be found to be inappropriately discussing a complaint, you may be disciplined for that conduct.

Management, or others involved in managing a complaint or investigation will endeavour to maintain confidentiality as far as possible. However, it may be necessary to speak with other workplace participants in order to determine what happened in order to resolve the complaint.

A worker who believes they are the victim of discrimination, bullying, harassment or violence may deal with the matter:

* **Informally** - by confronting the person with whom they are aggrieved (if the worker feels safe to do so); and/or
* **Formally** - by using Alseasons’ grievance procedure.

Should the worker elect to raise a formal grievance, Alseasons may carry out an investigation. Alternatively, Alseasons may take whatever action it deems necessary to attempt to resolve the worker’s grievance.

Alseasons expects that grievances are raised in good faith. If after an investigation by Alseasons, a worker’s complaint or statement is found to be false and malicious, disciplinary action may be taken against the worker up to and including termination of the worker’s employment or engagement.

If a worker’s complaint is substantiated, Alseasons may take disciplinary action against the perpetrator. Depending upon the seriousness of the breach of this policy, such action may include termination of a worker’s employment or engagement.

All workers are encouraged to talk to their supervisor/immediate manager or HR if they have any questions or are unsure about any aspect of this policy.

**Breach of this Policy**

Any worker who is found to have breached this policy may be subject to disciplinary action, up to and including the termination of employment or engagement.

# Gender Policy

This policy expresses Alseasons Hospitality Staff’s organisational position on gender equality, and is intended to inform any and all other related policies, e.g., EEO, Harassment and Bullying policies.

This policy applies to all aspects of Alseasons Hospitality Staff’s operations: employees, contractors.

This policy provides the gender equality framework for Alseasons Hospitality Staff’s

**Purpose**

Through integration of gender equity and equality into all of its internal organisational

processes, Alseasons Hospitality Staff expresses its commitment to promoting these values in the wider community.

**Related References**

Alseasons Hospitality Staff Australia Code of Professional Conduct, will be governed by [wgea.gov.au](http://wgea.gov.au). Workplace Gender Equality Act 2012.

**Definitions/ Terminology Clarification**

**Gender** - the social relationships and distribution of power and roles between different genders (can simultaneously be relations of cooperation, support, connection and conflict, separation and competition). These roles and relations are influenced by, and intersect with, other social relationships such as social class, ethnicity, sexuality and ability/disability etc. These roles and relationships are dynamic, changing over time and across cultures.

**Gender Equity** - the process of being fair to all genders.

**Gender Equality** – equal rights, opportunities and outcomes for all genders.

**Gender Justice** – the ending of, and provision of redress for, inequalities between men and women and other genders that result in women’s subordination to men. As process it refers to accountability of social institutions that are set up to dispense justice; as outcome it implies access to and control over resources, combined with agency (the ability to make choices).

**Gender Integration** - involves the integration of gender equality concerns into the analysis and formulation of all of the organisation’s policies, programs and projects. It includes initiatives to enable all genders equally to formulate and express their opinions genuinely to participate in decision-making.

**Gender Balance** – theoretically, the degree to which men, women and other genders hold a full range of positions in a society or organisation. However, most add that it should also include the element of quality alongside numbers, so as to avoid the token adding of members of any gender to make up numbers.

**Gender Lens** – refers to adopting a perspective that firstly brings into focus the

participation, needs and realities of all genders, then accommodating these.

**Gender Policy**

Alseasons aspires to reflect our principles of gender justice throughout all of its operations and activities.

A workplace that is equally appealing for all genders will provide us with access to the entire talent pool. For example; a workplace that is not attractive to women risks losing the best talent to competitors.

Alseasons seeks to have its organisational policy and practice as closely aligned as possible with the gender justice standards. Alseasons therefore considers the pursuit and implementation of gender justice to be essential to its organisation.

Alseasons is legally obliged to comply with various state and federal laws relating to gender equality and protection against discrimination, harassment or violence.

Alseasons is committed to ensuring gender equality in all areas of the organisation, including staffing, governance, management, decision-making, thereby giving all genders equal opportunity to shape the organisation and its work.

Alseasons will recruit staff on the basis of merit. Alseasons is committed to achieving gender balance throughout all levels of the organisation so that all functions, levels of responsibility and influence are fair. All recruitment processes will give consideration to gender balance and, where every candidate for a position is considered of equal merit, and then gender balance will be taken into account in the final decision.

Alseasons leadership will be committed to the integration of gender equality throughout the organisation. Alseasons offers equal training, through our in-house training and monitoring systems and manuals. Training assessments will be governed by performance and conduct.

* Alseasons will offer promotions based on merit and skills and are on offer to all.
* Alseasons remuneration is based on skill and performance.
* Alseasons will not permit within the organisation any discrimination on the basis of gender.
* Alseasons is committed to ensuring that its employees receive gender training to enable them to work in alignment with Alseasons gender policy.
* All genders will receive equal pay for equal or similar work.
* All genders will enjoy equal access to the organisation’s resources and opportunities, and disadvantage will be redressed wherever it exists.
* Alseasons will endeavour to ensure that all decision-making processes take into account the different personalities, styles and strengths of all genders, so that all voices may be authentically heard.
* Alseasons is committed to ensuring that Alseasons workplace is characterised by gender sensitivity and grace. Inappropriate language and behaviour will be addressed when it occurs.
* Where clear breaches of conduct in regard to gender justice occur, they will be addressed by supervisors, with a view to improving understanding and conduct.
* Reported incidents of sexual or gender-based harassment will be investigated and, if substantiated, responses will be in accordance with the Alseasons Bullying and Harassment Policy and if applicable, relevant state and federal legislation.
* Alseasons recognises the equal value/importance of all genders in parenting children, and is committed to providing reasonable and fair parental leave that supports all parents.

**Training and Development**

Alseasons will apply a gender lens to the planning and management of its programs and will endeavour to ensure that staff members represent Alseasons position on gender justice with grace and humility.

Alseasons will endeavour to use gender-inclusive/neutral language in its publications and advertising.

Alseasons will apply a gender lens to the planning, implementation and management of all Alseasons social and public events, to ensure that gender justice is maintained.

**Talent Identification Through Monitoring and Review**

Alseasons will undertake an internal organisational gender audit on a 5-yearly basis.

Through its performance appraisal processes, Alseasons will monitor the conduct of its employees with regard to gender-related behaviour.

Alseasons will monitor the language and content of gender-specific or related material that it intends to publish. This will be done in consultation with Alseasons Gender Working Group.

The directors of Alseasons will review the gender policy periodically, but at least every 5 years and/or at times when practice indicates the need for change.

**Talent Identification through monitoring and review**

Alseasons will undertake an internal organisational gender audit on a 5 yearly basis.

Through its performance appraisal processes, Alseasons will monitor the conduct of its employees with regard to gender-related behaviour.

Alseasons will monitor the language and content of gender-specific or related material that it intends to publish. This will be done in consultation with Alseasons’s Gender Working Group.

The Directors of Alseasons will review the gender policy periodically, but at least every 5 years and/or at times when practice indicates the need for change.

# Diversity and Inclusion Policy

**Purpose**

This Policy describes Alseasons’ approach to diversity and inclusion and how this is embedded in our work.

**Scope**

The policy applies to all employees who are working for Alseasons full time, part time and casual.

The principles of EEO and the relevant legislation is an important foundation for this policy. This policy provides guidance for all people practices across Alseasons including but not limited to those programs and initiatives specifically aimed at recognition and promoting workforce diversity.

This policy provides a framework to effectively embed and support a diverse workforce and inclusive workplace for all our people.

**Definitions**

**Diversity** is the term used to describe the differences and uniqueness of all people. It can refer to demographic characteristics, such as age, ethnicity, gender, sexuality, religion, socioeconomic status, academic ability or social origin. Diversity can also include personal characteristics such as disability, medical condition, carer’s responsibilities, pregnancy or potential pregnancy and any other characteristic of an individual. Lived experience of these diverse characteristics, particularly where they reflect those of our clients, is particularly valuable.

**Inclusion** means to embrace and value all people, irrespective of their diversity and diverse characteristics. It is about providing equity and opportunities and not permitting discrimination or intolerance.

**Principles**

Alseasons’inclusive workplace:

* Values the diversity of its employees;
* Upholds the right of every person to be treated with respect and fairness whilst performing their work;
* Is fair and equitable; and
* Is free of discrimination, harassment, bullying and other unlawful behaviour.

**Alseasons’ commitment to diversity and inclusion**

Alseasons values the diversity of its employees, and recognises that diversity is supported and enhanced by an inclusive workplace culture.

All people working with Alseasons have the right to be treated with respect and fairness and to enjoy an environment free of discrimination, harassment, bullying and other unlawful behaviour. This is a key feature of an inclusive workplace.

Alseasons is committed to finding ways to support and encourage a diverse workforce and inclusive workplace now and in the future. This commitment is considered and reflected in strategic and operational plans; policies, procedures and new initiatives.

**Benefits of a diverse workforce and inclusive workplace**

A diverse workforce, with a broad range of lived experience and perspectives, can better understand, support and engage the people we serve and the communities in which we work.

An inclusive workplace, where all employees feel safe and confident to contribute their ideas and perspectives, facilitates more creative, innovative and effective solutions for achieving Alseasons’ strategic objectives.

A diverse and inclusive workplace is attractive to potential employees and provides Alseasons with an advantage when competing for talent and retaining talented people.

By promoting a diverse workforce and inclusive workplace, Alseasons complies with legislative requirements.

**Embedding a diverse workforce and inclusive workplace**

Alseasons recognises that the culture of its workplaces is a product of the behaviour and conduct of its people. That is, how we treat each other while conducting Alseasons business.

**Alseasons sets clear expectations for our people regarding the actions, conduct and behaviour that support a diverse and inclusive workplace. These expectations are reflected in the Alseasons Code of Conduct, Alseasons Values, strategic and operational plans, policies, procedures, and other related documents.**

These expectations are also explained and reinforced through general communications and targeted education programs and compulsory training.

We promote a ‘speak up’ culture that encourages our employees and volunteers to report or raise conduct or behaviour that is not consistent with this policy or other related documents. Alseasons will address breaches appropriately. Processes for resolution of workplace issues, and disciplinary processes, are described in related documents described further on in this policy.

# Equal Employment Opportunity Policy

Equal Employment Opportunity (EEO) is the principle that all people have equal access to employment opportunities, free from discrimination and bias. It is one of the ways Alseasons can promote and embed a diverse and inclusive workplace.

In addition, as an employer, Alseasons has legal obligations to conduct its business in a manner consistent with EEO.

Alseasons upholds the EEO principle and meets its legal obligations by:

* Identifying and removing unnecessary barriers to employment;
* Making employment decisions based on merit, rather than on characteristics that are irrelevant to successfully fulfilling the responsibilities of the position;
* Ensuring that employees’ access to career development opportunities including training and development, promotion, secondments or other job opportunities, are available to all employees and tailored to meet individuals’ skills, knowledge and experience, and the business needs.

Recruiting leaders have a responsibility to ensure that recruitment decisions are based on assessing the skills, knowledge and experience of applicants in relation to the inherent requirements of the position and Alseasons‘ values.

**Eliminating unacceptable and unlawful behaviour**

Alseasons does not tolerate behaviours that undermine a diverse workforce and inclusive workplace, including but not limited to behaviour that is unlawful such as discrimination, harassment, bullying, vilification and victimisation.

The workplace includes an employee’s place of work as well as any work-related function (including conferences, seminars and social events).

Alseasons encourages employees to speak up about unacceptable and unlawful behaviour in the workplace and supports employees to do this by providing them with access to advice, support and a safe and confidential process to raise and resolve issues, grievances and complaints.

Alseasons provides targeted education and training for leaders and employees so they can recognise unacceptable and unlawful behaviour in the workplace and know what to do if they experience, witness or become aware of it.

**Definitions - unacceptable and unlawful behaviour**

Unacceptable behaviour is any behaviour that undermines Alseasons having a diverse workforce and inclusive workplace and includes behaviour that is not consistent with Alseasons’ Code of Conduct and the Alseasons values.

Unlawful behaviours are defined in various state and federal laws and include discrimination, harassment, bullying, vilification and victimisation.

**Addressing unacceptable and unlawful behaviour**

Alseasons expects and encourages its employees and volunteers to speak up about and address, through appropriate channels, unacceptable behaviour if it occurs in Alseasons workplaces.

Alseasons’ preference is for the person to firstly address the behaviour directly with the person exhibiting the behaviour, if this is safe and appropriate. If it is not possible to address the issue directly, then the person should raise the issue with their direct leader, another leader or their HR Manager.

People raising such concerns are encouraged to consider measures to enhance their psychological safety at this time, such as having a support person alongside them when raising issues, and seeking support.

Alseasons’ process for addressing unacceptable and unlawful behaviour in the workplace upholds the principles of procedural fairness as outlined in Alseasons*’ Grievance Policy*.

**Education and training**

Alseasons has set clear expectations for our people regarding their behaviour and conduct in the workplace. To ensure everyone understands what is expected of them, all employees, contractors and agency staff are required to complete relevant training that is provided.

All new employees must complete initial training during the induction process, which includes the importance of a diverse workforce and an inclusive workplace at Alseasons.

Leaders are responsible for ensuring their team members have completed required training.

**Responsibilities and Guidelines**

At Alseasons, diversity and inclusion are everyone’s responsibility. Certain groups have additional responsibilities as described below.

**Responsibilities of Employees**

* Comply with the obligations under this and related policies.
* Understand what it means to value diversity and the attributes of an inclusive workplace at Alseasons.
* Complete all compulsory training including induction and refresher training.
* Contribute to promoting an inclusive workplace by valuing and respecting others’ differences.
* Speak up about behaviour in the workplace that is not consistent with this policy. Issues can be raised with the director or the HR manager.

**Responsibilities of Directors and Managers**

* Ensure team members complete compulsory training.
* Model, acknowledge and encourage desired behaviour.
* Create a work environment that promotes, and values open dialogue, diverse perspectives and equality of opportunity in employment.
* Consider both the employees’ and the business’ needs when applying the policy.
* Seek help and advice from the client’s HR manager as required to ensure this policy is applied appropriately.
* Be particularly conscious of this policy in making decisions as they relate to recruitment, development of employees and approvals.

**Responsibilities of People and Culture team**

* Promote the value of a diverse workforce and inclusive workplace with business leaders.
* Ensure Alseasons commitment to a diverse workforce and inclusive workplace is considered and reflected in strategic and operational plans; policies, procedures and new initiatives.
* Develop appropriate measures and regular reporting to assist the director, the HR manager to assess Alseasons’ performance in the area of diversity and inclusion.
* Provide advice and support people leaders in relation to promoting and embedding a diverse and inclusive workplace.
* Assist leaders to apply the policy appropriately.

**Breaches of this Policy**

Alseasons takes its commitment to encouraging and promoting a diverse workforce and inclusive workplace very seriously.

Breaches of this policy may result in disciplinary action, up to and including termination of employment, consistent with Alseasons’ policies including the *Grievance Policy*.

**Changes to this Policy**

This Policy is issued by authority of the Alseasons, which may review and amend it from time to time as required.

# Sexual Harassment Policy

Alseasons Hospitality is committed to the provision of a fair, healthy and safe workplace in which everyone is treated with dignity and respect and in which no individual or group feels offended, threatened or intimidated. Everyone in the workplace has the right to a workplace that is safe and free from sexual harassment.

Sexual harassment is a legally recognized form of sex discrimination. Sexual harassment and sex discrimination are both unlawful under the Sex Discrimination Act and Fair Work Act.

Sexual harassment in any form will not be tolerated. We recognize that sexual harassment can seriously affect workers' working lives by detracting from a productive working environment and can seriously impact on the health, confidence, morale, and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behavior.

**Sexual Harassment**

Sexual harassment is a specific and serious form of harassment. It is unwelcome sexual behavior, which could be expected to make a person feel offended, humiliated, or intimidated. Sexual harassment can be physical, spoken or written. It can include:

* inappropriate physical contact, such as unwelcome touching
* inappropriate staring or leering
* making a suggestive comment or joke
* sharing sexually explicit pictures or posters, sending sexually explicit emails or messages
* a request for sex
* intrusive questioning about a person's private life or body
* unnecessary familiarity, such as deliberately brushing up against a person
* an insult or a taunt of a sexual nature
* harassment on the grounds of sex
* behavior that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

Behavior that may be considered sexual harassment in one situation may not be in others, for example flirtation or love and affection between two consenting individuals which is mutual, consensual, or reciprocated is not sexual harassment. A single incident is enough to constitute sexual harassment – it doesn’t have to be repeated. If substantiated, sexual harassment is considered serious misconduct under the Fair Work Act and can amount to a valid reason for termination without notice.

Sexual harassment does not necessarily have to take place in the workplace to be unlawful. Sexual harassment in the course of employment can occur during work hours, at work-related events such as training or social events, between people sharing the same workplace, or even between colleagues outside of work

Manager and supervisors have an additional responsibility to ensure the safety and welfare of their employees this includes modelling appropriate standards of behaviour, taking steps to educate and make staff aware of their obligations under this policy and the law and responding quickly and appropriately to any form of sexual harassment.

The Employer takes sexual harassment seriously. This policy requires all staff (including apprentices and trainees) volunteers as well as contractors to ensure their behaviour is respectful and appropriate. These examples are not exhaustive and disciplinary action up to and including termination of employment, will be taken against workers committing any form of sexual harassment. Appropriate action in relation to an employee will include disciplinary action in accordance with the Employer’s disciplinary and disciplinary termination procedure. For other workers, appropriate action may include termination of their engagement with the Employer

**Sexual Harassment Complaint Procedures**

**Informal complaint**

If you experience unwelcomed behavior or sexual harassment, we encourage you to make it clear to the alleged harasser on an informal basis that their behavior is unwelcome and ask the individual to stop.

We recognize that complaints of sexual harassment can be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues directly with management or a more senior colleague you feel comfortable raising your complaint with (whether or not that person has a direct supervisory responsibility for you). The more senior colleague or manager

will then determine the next steps in accordance with this and any other relevant Company policies.

**Formal Complaint**

Where the informal approach fails or if the sexual harassment is more serious, you should bring the matter to the immediate attention of management as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the sexual harassment so that the written complaint can include:

* the name of the alleged sexual harasser
* the nature of the alleged incident of sexual harassment
* the dates and times when the alleged incident of sexual harassment occurred
* the names of any witnesses and
* any action already taken by you to stop the alleged sexual harassment.

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension of employees (with contractual pay) until the matter has been resolved. The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation the Employer will provide you with a letter. Depending on the outcome of the investigation, the Employer may meet with you to discuss any further steps required to be taken to prevent harassment in the future. Due to the serious nature of sexual harassment, if you decide to not proceed with a formal or informal complaint, the Employer reserves the right to consider appropriate action in the circumstances in order to ensure the safety and wellbeing of its employees. The Employer will consider the seriousness of the behavior and circumstances in taking action this may include a review of current processes for preventing and responding to sexual harassment, providing training and reminders to employees of their general obligations not to sexually harass others, following up with you on your concerns as well as monitoring behavior in the workplace.

# Respect at Work Policy

It is the commitment of this company and its management to ensure this place of work is free from negative, aggressive, and inappropriate behaviour’s, and that the environment is aimed at providing high quality products and services in an atmosphere of respect, collaboration, openness, safety and equality. All employees have the right to be treated with dignity and respect.

All complaints of negative and inappropriate workplace behaviour’s will be taken seriously and followed through to resolution, and employees who file complaints will not be victimized for “whistle-blowing” or reporting others for their inappropriate behaviour.

**Scope**

Protection from negative, aggressive, and inappropriate behaviours extends to management, fellow employees, subordinates, clients, customers and other business contacts and expands beyond the place of work to off-site and work-related social events. It is the responsibility of all employees and managers of this company to provide a healthy workplace environment to peers and co-workers, where all communication and interactions are marked by dignity and respect.

**Acceptable and Healthy Workplace Behaviours Defined**

Acceptable and healthy workplace behaviours are any behaviours that promote respect, positivity and civility in our workplace. They include, but are not limited to;

* Using respectful, supportive, and encouraging language in all interactions, no matter the subject of conversation
* Questioning a peer’s position on an issue politely rather than asserting your position is the right one; listening to your peer’s position with an open mind
* Giving peers direct, non-personal feedback as opposed to criticism
* Expressing appreciation when a peer does something correctly and in a timely manner
* Respecting each other as adults and trusting their decision-making abilities
* Approaching conflict with maturity and true desire for resolution, rather than as a fight or opportunity to belittle a co-worker
* Maintaining a positive attitude, even when you are having a bad day

**Inappropriate and Unacceptable Behaviours Defined**

Inappropriate and unacceptable behaviours are defined as negative and even aggressive acts aimed at one or more individual and causing them to feel hurt, embarrassed, incompetent, disrespected, anxious, or depressed. Examples include, but are not limited to:

* Excessive yelling, repeated emotional outbursts, berating others, using a harsh tone of voice
* Talking down to others or using degrading remarks or tone of voice
* Criticizing or talking down to others in front of a group; using a condescending tone
* Social exclusion or ostracism, ignoring others, silent treatment
* Treating some less favourably than others
* Undermining another’s work by giving impossible to meet deadlines or workloads
* Excessive monitoring of work or unnecessary micromanagement
* Arbitrary or punitive punishment without cause; inconsistent discipline
* Withholding pertinent work-related information; undermining another’s work by not giving them enough information to do what is required of them
* Gossiping or spreading rumours
* Manipulating a person’s job content; unwarranted removal of core responsibilities to make them feel bad
* Blaming others for things out of their control
* Acting “out to get” others
* Making threats; using intimidating tactics
* Any malicious behaviour a reasonable person would find unprofessional, disturbing and harmful to their psychological health

These types of behaviours are well recognized has having damaging consequences for their recipients, the observers of the behaviour, and the organization as a whole and are therefore not tolerated.

**Management Responsibility**

Management and others in positions of authority and workplace representatives have a particular responsibility to ensure that healthy and appropriate behaviours are being exhibited at all times and that complaints to the contrary are addressed speedily.

Management will:

* Provide good examples by treating all with courtesy and respect
* Promote awareness of the policy and complaint procedures
* Be vigilant for signs of inappropriate behaviours at work through observation and information seeking, and take action to resolve the behaviour before it escalates
* Deal sensitively with employees involved in a complaint, whether as complainant or alleged aggressor
* Explain the procedures to be followed if a complaint of inappropriate behaviour at work is made
* Ensure that an employee making a complaint is not victimized for doing so, and seek resolution of such behaviour if it occurs
* Monitor and follow up the situation after a complaint is made so as to prevent recurrence of the behaviour.

**Employee Responsibility**

Employees can contribute to achieving a work environment which does not tolerate aggressive behaviour at work. Employees should report what they see in the workplace as it relates to behaviour’s defined as unacceptable; employees are in a far better position than management to know what is happening with peers and co-workers. Employees should also co-operate with preventative measures introduced by management, and recognize that a finding of unacceptable behaviour’s at work will be dealt with through appropriate disciplinary procedures. Equally, a finding of vexatious complaints will also be dealt with through appropriate disciplinary procedures.

**Training Programs**

As part of its commitment to encouraging positive and healthy behaviours, the company has established training programs for all employees and managers. Training is included as part of the new hire orientation, and thereafter annually as scheduled by the Company. Training will identify factors which contribute to a bully-free environment, familiarize participants with responsibilities under this policy, and provide steps to overcoming a bullying incident, including filing an adequate and informed report to the appropriate party.

**Process for Investigation of Complaints**

The aim and objectives of a formal complaint process include a thorough investigation of negative, aggressive, and inappropriate behaviour’s allegations, written documentation from all parties involved, and resolution in a timely manner. Resolution will include any number and combination of possibilities, depending upon the outcome of the complaint process (e.g., training, disciplinary actions, transfer of employees involved, etc).

Any employee or manager seeking to file a complaint against an alleged aggressor should take special care to ensure the complaint is confined to and consists of precise details of each incident of negative, aggressive, and inappropriate behaviours, including dates, times, locations and any witnesses. Formal complaints should be filed with your manager or with your Human Resources Representative (HRR), and should be documented in writing.

The person complained against will be notified in writing by the HRR that an allegation has been made against him or her, and assured of the organization’s presumption of innocence at this juncture.

The HRR receiving the complaint or another representative from Human Resources will act as an investigator, unless otherwise specified by management. The objective of the investigation is to ascertain whether or not the behaviours complained of occurred, and therefore will include interviewing the person complained of, witnesses, managers and any other party that may be involved with or had witness to the alleged behaviours. All interviews will be documented in writing in order to maintain clarity throughout the investigation. The investigation will be conducted thoroughly, objectively, with sensitivity and utmost confidentiality, and with due respect for the rights of both the complainant and the alleged aggressor. The investigation will be completed as quickly as possible.

Upon completion of the investigation, the investigator will submit a report to management or another party deemed appropriate at the outset of the complaint that will include the investigator’s conclusions.

The employer will decide in light of the investigator’s report and follow up comments by the parties what, if any, action will be taken. The HRR will inform the complainant and the person complained against in writing of the action plan, and each will have the opportunity to appeal the report and/or the action plan.

Appeals should include a detailed outline of the reason for the appeal in writing, and should be submitted to and heard by another party that did not participate in the initial report or investigation as designated by management.

Where a complaint has been upheld, management will follow appropriate disciplinary procedures and decide what action in regards to the complaint is necessary. The employer will continue to keep the situation under review, and may provide counselling for the complainant where appropriate. Preventative measures will also be taken to ensure elimination of the hazard in the future and reduce effects of the prior exposure.

# Environmental Policy

**Environmental Impact**

Alseasons aim is to achieve a high standard of care for the natural environment in all of the activities in which we are engaged and conduct our business with respect and consideration for the environment. As a service organization, our operations are entirely office-based. Thus, our environmental impact is small compared to that of manufacturing companies.

**Our objectives are to:**

* Comply with all relevant legislation and codes of practice relating to our activities, identify, assess and monitor environmental hazards and the associated risks arising from our operations.
* Pursue continuous improvement in production and waste management processes.
* Communicate regularly with employees about our objectives and individual responsibilities.
* Inform our clients and suppliers of our objectives and co-operate with their requirements for environmental responsibilities.
* Communicate with the community and government regarding the development of legislation that may affect our business.
* Conform to all client site regulations with regard to environmental issues.

Alseasons Hospitality Staff accepts the responsibility for environmental management as an important one. All employees are expected to comply with the policies, procedures and relevant codes of practice for environmental care.

We shall not cause, willfully, by neglect or ignorance, damage to the environment as a result of our operations or activities. To this end, all employees receive information, instruction and training in environmental responsibility.

**Environmental Procedure**

• Alseasons is committed to ensuring our business operations and undertakings are carried out in a manner that does not adversely impact on the environment in which we operate and we will do this by complying with all relevant Environmental legislation.

• We shall identify all areas of our business undertakings that have, or may have, an impact on the environment, or the environment in which our employees and contractors work.

• Ensure continuous improvement to our business undertakings to reduce pollution and reduce our overall impact on the environment.

# Performance and Development Policy

This policy applies to all casual and permanent employees of AHS.

The **purpose** of this policy is to ensure the Performance and Development system supports and maintains a culture of learning, innovation, leadership and accountability for outcomes. The policy will support the achievement of enhanced leadership and performance management across the AHS.

**Definitions**

**Code of Conduct** encompasses the standards and values that individuals and organisations are expected to follow.

**Feedback** is providing information to another person about their performance or impact of their actions on a person, group or activity. Effective feedback is specific, timely and focuses on a specific behaviour.

**Goals** are objectives, targets, purposes, intentions and plans that both the manager/supervisor and the employee intend to achieve. To be most effective, they need to be specific and measurable.

**Performance and Development** is the system that supports a culture of ongoing improvement, feedback and development within the AHS workplace. The focus of Performance and Development is on personal improvement for effective performance.

**Performance Development Planning** is the process that enables the manager/supervisor and the employee to identify and confirm business and personal goals that are most significant to AHS’ success.

**Performance Improvement Plan (PIP)** is designed to facilitate constructive discussion between staff member and their supervisor and to clarify the specific aspects of work performance to be improved. This is usually used when there are significant underperformance issues and a structured approach is required to address concerns.

**Performance Management** is the holistic process of creating a work environment or setting in which people are enabled to perform to the best of their abilities. It is not merely a focus on current performance but is a wider system that supports the employment cycle.

**Statement of duties** is the primary document that describes the detail of a staff position. It includes a clear and concise description of the role’s focus, duties and responsibilities, along with the skills and knowledge required to undertake the role.

**Principles**

The Performance and Development System is underpinned by the following key principles:

1. Effective performance is required of all employees regardless of role, responsibility or level.
2. Managers and employees are jointly responsible and accountable for working together to continually improve performance and achievement of outcomes.
3. Leadership is essential to creating the culture of professional improvement, feedback and development necessary to support effective performance management.
4. Participation in the Performance and Development process must enable every employee to understand AHS’ values and strategic priorities and the way in which their role and performance outcomes contribute to achieving these.
5. Participation in the Performance and Development process must enable every employee to identify how they contribute to achieving outcomes at their level.
6. Underperformance must be actively addressed and managed through a structured, fair and transparent process.
7. All managers and employees are to be provided with appropriate training to enable them to participate in and fulfil their performance management responsibilities.

**Requirements**

This policy must be read and applied in conjunction with the Performance and Development Procedure and the Managing Underperformance Procedure.

**Performance and Development Procedure**

**Purpose**

To detail the way in which the Performance and Development Policy is to be put into action; provide managers and employees with the required set of processes for effectively managing performance.

**The Performance and Development Cycle**

The diagram below represents the four key stages in the Performance and Development Cycle. Each department can determine the timing of this cycle, as long as the cycle is completed for each individual employee at least once per year.

**STAGE 1: Preparing for the Performance and Development Meeting**

The employee must be provided with sufficient notice of the Performance and Development meeting to allow both parties to prepare for the discussion.

The manager is to ensure the employee understands what will be covered during the meeting, is familiar with the Performance and Development process and requirements, including the Performance and Development Plan (PDP) template.

The manager and employee are to agree on the nature of the preparation for the meeting, including the documents that will be referred to in preparing the plan. Both the manager and employee are to ensure they are familiar with these documents prior to the meeting.

**Guidelines**

The manager and employee are able to determine the approach they take to preparing for the meeting.

They may agree that the employee will undertake a form of self- assessment prior to the meeting, using the Statement of Duties.

They may agree that the employee completes a draft of the PDP before the meeting to inform the discussion.

The degree of self-assessment and preparation undertaken by the employee should be based upon consideration of their experience and confidence with the process, and their employment level.

Both the manager and employee should focus their preparation on identifying the priority areas for the employee to concentrate on for the next 12 months, including areas of performance where improvement and development are most relevant.

There are a range of reference documents which may be useful in preparing for the discussion including:

* Performance Management Policy
* Performance Management Procedures
* employee’s Statement of Duties
* Core Performance Framework
* previous performance and development plans
* other business planning documents.

**STAGE 2: Discuss and Develop the PDP**

The employee and their manager must meet to formally discuss and develop the employee’s PDP at least once per year. The development and documentation of the PDP must include the following elements:

**Goals/Objectives**

This section must clearly articulate agreed goals/objectives for performance and improvement that will be a priority for the employee to focus on achieving during the life of the PDP.

In deciding on the goals/objectives, the manager and employee are to take into consideration the key areas of priority that have been identified for the workplace, and which are relevant to the employee’s role, responsibilities and duties, and professional standards. The goals/objectives should also be based upon the employee’s statement of duties as well as identified areas of performance improvement for the employee.

**Actions**

This section of the PDP must identify the action the employee is to take to ensure they meet the identified goals/objectives and deliver on the agreed outcomes.

This section is to include the major activities, tasks, projects and/or responsibilities the employee needs to undertake during the life of the PDP. The actions are to clearly relate to the identified goals/objectives and must be realistic and achievable.

**Identified Development Need**

The manager and employee are to discuss and identify any skill gaps or development needs relating to the identified goals/objectives and actions.

Specific strategies are to be developed to address the identified development need. The type of professional development to be undertaken and the proposed timeframe must be documented in the PDP.

Development opportunities are to be negotiated to take into account the priorities and resources of the workplace, and to ensure appropriate balance for the needs of all employees within AHS. Development opportunities must be realistic and deliverable and are to reflect the principle of collective responsibility for improvement.

**Outcomes and Measures of Success**

The outcomes and measures will establish the way in which the employee and manager will assess whether the performance goals/objectives and standards have been met.

The PDP must identify the specific outcome that is expected to be delivered in association with each performance goal.

Agreed performance measures are to be identified for each set goal. This will establish the way in which the employee and manager will assess whether the requirement has been met.

**Core Performance Framework**

The manager and employee are to incorporate the elements of the Core Performance Framework into the employee’s PDP. A joint understanding is to be reached as to how the employee is expected to demonstrate these requirements in the context of the actions identified in their plan.

**Code of Conduct and Principles**

The development of the PDP must include discussion about the service principles, ensuring the employee is familiar and understands what is required of them.

**Guidelines**

*General information for the manager:*

• Create an environment that demonstrates an opportunity for supportive two-way discussion.

•  Review the purpose of the discussion.

•  Ensure the employee has the opportunity to talk about what they think about their own performance.

•  Review and summarise the major points and agreements.

•  If there are points of disagreement, jointly devise a strategy to follow up on these.

•  Make a date for next feedback discussion.

***Establishing the Goals/Objectives:***

• The aim of this section of the PDP is to ensure the employee has a clear understanding of the link between the goals and priorities of the workplace they work in and their own role and responsibilities.

•  It is recommended that goals/objectives are limited to identification of 4 or 5 key areas.

***Establishing the Actions:***

• The actions should be expressed in clear unambiguous language to provide a mutually understood basis for future discussions about the employee’s performance.

•  A reasonable number of actions should be identified for each goal. This is a matter for negotiation between the manager and the employee.

***Identified Development Needs:***

• A general discussion should take place regarding current performance in line with the newly identified goals and actions. This will assist in identifying the learning needs which may need to be addressed in order for the employee to meet the expected goals over the assessment period.

•  Strategies may include options such as on-the-job or formalised training, coaching, self- learning, specific developmental opportunities, projects, peer mentoring, cross-skilling etc.

***Establishing Outcomes and Measures of Success****:*

• The identified performance outcome should relate directly to the performance goal and show how it will be achieved.

• Both parties need to agree on the type and source of evidence that will be relied upon in the performance assessment.

• The measurement may be quantifiable, i.e., it may be a deadline to be met, or a number of things to be completed.

• The measurement may be qualitative, i.e., it may be an activity that has to be done to a certain standard.

• Formal performance assessment will have the most validity when it is based on multiple sources of evidence.

**STAGE 3: Ongoing Feedback, Support and Development**

Managers and employees are jointly responsible for ensuring the development and improvement strategies identified in the PDP, including professional development, are followed through.

During the period leading up to the evaluation, assessment and review, the manager must ensure opportunities are taken to provide regular feedback on progress against the goals, actions and outcomes documented in the PDP. This feedback, detailing the employee’s progress, is to be recorded on the PDP.

Feedback is to be timely, frequent and focused on improvement. Managers must provide constructive and evidence-based feedback. Feedback must be specific, based on examples and focus on the work requirements over which the employee can exercise control.

**STAGE 4: Evaluation, Assessment and Review**

At least once per year the manager must evaluate the employee’s performance against their PDP. In undertaking this assessment, the manager must:

* Evaluate and assess the employee’s performance against the PDP objectively and against the agreed performance measures and outcomes.
* Arrange a meeting with the employee to discuss the evaluation, providing sufficient notice to enable both parties to prepare;
* Provide the employee with clear feedback about their performance, and recognise achievements;
* Advise the employee of the assessment, and be clear about the basis and reasons for the assessment; and
* Document the reasons for the evaluation and assessment on the PDP template. The assessment is to determine whether the employee:
	1. *Has achieved the required performance outcomes and standards*

An employee has achieved the required performance outcomes and standards where they have met the requirements of their PDP and relevant standards/capabilities. Where this assessment is made, the manager and employee must jointly review and update the PDP to reflect the performance goals, actions, development needs, measures and outcomes for the next cycle. The employee then continues in the normal performance cycle.

* 1. *Is progressing towards meeting required performance outcomes and standards*

An employee is to be assessed as progressing toward meeting required performance outcomes and standards where they have:

• achieved the majority of requirements of their PDP and relevant standards/capabilities, and

• will meet the remaining requirements within a reasonable timeframe, and with further support or development where required.

Where this assessment is made the manager and employee should revise the PDP to include appropriate support and development strategies and modify timeframes where necessary. Regular review meetings should be scheduled to monitor progress.

* 1. *Has not achieved the required performance outcomes and standards.*

An employee has not achieved the required performance outcomes and standards where they have not achieved the requirements of their PDP and relevant standards/capabilities despite having been provided with appropriate support and development.

In cases where an employee is not meeting key performance requirements, standards or capabilities, the manager must consider appropriate action with reference to the underperformance procedures.

**Confidentiality, Document Access and Document Storage**

* The original signed PDP must be securely stored in the workplace. The HR manager of Performance and Absence Management is responsible for ensuring that the most recent PDP of each employee is stored securely on the employee’s file.
* These documents ordinarily remain confidential between the manager and employee. Where necessary, the Director or Manager is to be granted access to any Performance and Development records of employees within AHS.

**Grievance Procedures**

If at any stage during the Performance and Development process either the employee or manager do not agree on the content of the PDP and cannot resolve the matter, either party can seek an independent review.

Initially an employee should make attempts to resolve any disagreement through discussion with their manager. Following this discussion, if either party remains dissatisfied, they can request an independent review.

An independent review will involve both the AHS HR manager and the relevant senior (next level) manager of the employee’s area. In the event that the AHS HR manager is unavailable or the dispute arises within the HR department, assistance will be sought from the director.

The review panel may seek written submissions or conduct interviews with both parties, documenting the reason for the dispute. The review panel is to assess the dispute, seeking further supporting evidence if necessary, and advise the parties of the outcome and reasons for their decision.

If this does not resolve the issue and either party remains dissatisfied, employees are to contact Fair Work Commission Government Agency.

**Training**

It is important that all staff understand the Performance Management policy and application of the performance and development process. HR can conduct training programs for staff and managers/supervisors as necessary. Casual staff can attend in-house up skilling training.

**Quality Assurance**

Performance and Development documentation is subject to review to ensure quality assurance. Senior Manager’s or their Managers are responsible for auditing employees

AHS in their area on an annual basis. The purpose of audits is the assurance of quality by ensuring that employees and managers are undertaking the Performance and Development process and completing PDPs correctly.

When reviewing documentation, ensure that all sections of the PDP have been completed (where applicable), dated and signed by both the employee and manager. Where planning, feedback or evaluation comments are to be provided, review whether sufficient information has been provided against the criteria contained within the Performance and Development Procedure.

Any areas of non-conformance or where improvement opportunities have been identified should be addressed with the manager responsible for completing the PDP.

Senior managers / managers are responsible for completing the PDP Quality Assurance Record template on an annual basis to record details of the audit process.

**Managing Underperformance Procedure**

**Purpose**

To enact the Performance and Development Policy; providing managers and employees with the required set of processes to effectively manage underperformance.

**Underperformance** means when an employee is not meeting the specific performance requirements identified in their Performance and Development Plan, or the general standards of performance and behaviour expected of an employee, despite having received reasonable support, development and training to enable them to perform effectively. Identification of underperformance and commencement of the process to manage the underperformance may occur either:

•  as a result of a formal assessment of *has not met the standard required* in the employee’s annual performance assessment, or

•  during the course of the performance cycle, when a manager identifies issues of underperformance and despite reasonable efforts to address the underperformance informally, the underperformance continues.

While an underperformance process is underway, the employee ceases to be involved in the annual Performance and Development cycle. Where the underperformance issue is successfully resolved, the employee returns to the normal annual Performance and Development cycle.

**Principles**

The following principles apply to the management of underperformance:

•  Underperformance is not acceptable and employees are required to share responsibility for improving performance and to participate in the processes established in these procedures.

•  Managers are to address instances of underperformance in a timely and appropriate manner, in accordance with these procedures.

•  The primary goal of the underperformance process is to rectify underperformance issues and ensure the employee’s future work performance is maintained at a satisfactory level.

•  Underperformance is to be managed in accordance with the principles of natural justice and procedural fairness. This means that an employee has the right to be informed of the specific details of the underperformance issue, is entitled to be heard and must be given a reasonable opportunity to present their case.

•  Employees and managers have a right to be treated fairly and without bias and are to be informed of the reasons for a decision which affects them.

•  Employees involved in the underperformance process must be provided with sufficient notice of any meetings.

•  Employees involved in the underperformance process are entitled to support and/or representation at all stages of the process and are to be advised of this right.

•  Meetings and discussions must be conducted in an appropriate location having regard to privacy, confidentiality and provisions for people with disability.

•  All matters arising during the process are to be kept in the strictest confidence.

•  Records of all meetings and discussions are to be provided to the employee.

•  Managers are to provide the employee with access to appropriate avenues of support throughout the process, including the Employee Assistance Program.

•  The decision to terminate employment only occurs when it is evident performance will not improve and the employee has been given the opportunity and support to achieve effective performance.

**General Provisions**

An employee will generally be required to remain working in their current position while an underperformance process is underway, unless the transfer to an alternative role as part of specific strategy to address the underperformance issue.

Where an alleged breach of the Code of Conduct occurs during the course of an underperformance process, the alleged breach is to be dealt.

**Procedure Details**

**Stage 1: Early Intervention and Support**

When an underperformance issue is initially identified the manager must address the issues promptly. The manager must document the discussions and outcomes.

The manager must ensure the employee is provided with reasonable opportunity and support to address the underperformance issue. In most cases it is expected that this early intervention and dedicated support for the employee will be sufficient in addressing underperformance.

Where this early intervention has not resolved the underperformance and/or the formal performance assessment has resulted in an assessment of *has not met the standard required,* the manager is to seek advice from their next level manager and the relevant HR representative on an appropriate course of action. Where advice is given to commence a more formal management of the underperformance issue, the matter proceeds to Stage 2.

Where it is identified during the discussion that there are more serious issues impacting on the employee’s performance e.g., a medical condition or issues of misconduct, the manager is to seek advice from the relevant HR representative on the appropriate course of action.

**Stage 2: Performance Improvement Plan (PIP) Process**

The process is outlined below.

1. The manager is to refer the matter to the director. To make a recommendation to the HR manager for the appropriate course of action.
2. The HR manager will then determine whether there is sufficient evidence to proceed with formal management of underperformance.
* Where the HR manager determines the evidence is insufficient to proceed with formal management of underperformance, they are to refer the matter back to the manager to continue Stage 1.
* Where the HR manager determines there is sufficient evidence for a formal process to proceed, the HR manager is to refer the matter back to the manager to develop a PIP with the employee.

The HR manager’s decision to commence the PIP process is to be recorded in feedback

The manager must formally advise the employee in writing regarding commencement of formal process. The advice is to include:

* notice that a formal process has commenced and that a PIP is to be developed;

•  specific details of the underperformance issue to be addressed;

•  details of the scheduled meeting;

•  the employee’s right to provide a response to the alleged underperformance in writing or at the scheduled meeting;

•  the employee’s rights to be supported or represented by a person of their choice throughout the process, and the requirement for them to advise in writing if they decline this offer; and

•  a clear statement on the consequences if performance does not improve.

(3) The manager and employee (and where applicable, support person) must meet to establish a PIP. During this meeting the employee must be provided with an opportunity to respond to the underperformance issue, to provide any supporting evidence or documentation or additional information regarding issues that may be impacting on their performance. The manager is required to consider all information provided by the employee.

Where it is identified during the discussion that there are more serious issues impacting on the employee’s performance e.g., a medical condition or issues of misconduct, the manager is to seek advice from the relevant HR representative on the appropriate course of action.

The manager, in consultation with the employee, must determine an appropriate timeframe for the PIP. The minimum period for a PIP is to be 4 weeks, and the maximum period is to be 12 weeks. In determining the PIP timeframe consideration is to be given to the following factors:

•  reasonable time for support/development strategies to be implemented;

•  reasonable time for employee to act on agreed outcomes and demonstrate sustained improved performance;

•  the general expectation that performance will improve in a timely manner;

•  the level of support and development already provided to the employee to address the underperformance issue; and

•  availability of the employee over the full period of the PIP (taking into account any pre-approved absences).

 The outcomes of the discussion must be documented in feedback

•  specification of the performance requirements that have not been met;

•  the actions the employee is required to undertake to improve performance;

•  details on the development and support that is to be provided to the employee to help them achieve the documented performance outcomes;

•  the timeframe for achievement, milestones to be met and the frequency of monitoring; and details on how performance will be measured and the type of evidence to be used.

* Interim Assessment: At the agreed intervals a review of the employee’s performance including formal, documented feedback is to occur including the opportunity for the employee to respond.

Where the outcome of the first interim assessment is that performance has improved to a satisfactory level, the manager may determine that the employee can resume the normal Performance and Development Cycle. The employee is to be advised of this outcome and return to Performance Management Cycle, including notification that the improvement must be sustained or the matter may be referred back to the HR manager to consider an appropriate course of action.

Where the outcome of the first interim assessment is that performance has not improved, the manager is to refer the matter back to the HR manager.

**Grievance Procedures**

Initially an employee should make attempts to resolve any disagreement through discussion with their manager. Following this discussion, if the employee remains dissatisfied, they should discuss their concerns with their relevant senior manager. If this does not resolve the issue employees are to use Fair Work Commission Government Agency.

# Workplace Grievance Policy

**Overview**

Alseasons Hospitality Staff recognises that unfortunately issues may arise in the workplace from time to time, which may need to be addressed and resolved with the assistance of others, with the aim of developing and maintaining a harmonious working environment. With this aim in mind, the purpose of this policy is to have workplace issues (pursued as employee grievances) handled and resolved in a prompt, fair and effective manner.

**Scope**

This policy applies to all employees of Alseasons Hospitality Staff.

Alseasons Hospitality Staff expects that grievances sought to be addressed and resolved under this policy will relate to a workplace issue(s) about which the employee feels genuinely aggrieved.

**What is a ‘Grievance’?**

For the purposes of this policy, a ‘grievance’ means any type of issue (including problem, concern or incident) about a work-related activity or matter raised by an employee in respect of which the employee genuinely believes that they have been subject to unreasonable, unfair or otherwise inappropriate treatment, action or conduct. For example, a grievance may relate to:

* Interpersonal conflicts between work colleagues;
* Work allocation;
* The work environment;
* Occupational health, safety and welfare in the workplace;
* Supervision and development;
* Harassment;
* Workplace bullying;
* Inappropriate workplace behavior
* Discrimination.

**Dealing with a grievance**

Any employee who has a grievance should not ignore it.

Ignoring it might be interpreted by any other person(s) involved as consent or acceptance that the offending conduct is acceptable or can continue.

Ignoring the matter may also result in a breach of Alseasons Hospitality Staff or employee’s legal duties (e.g. under the harmonised Work Health and Safety laws, there is an obligation on workers to take reasonable care of their own health and safety).

In some cases, if the subject matter of the grievance is not addressed, it may result in psychological or physical injury or otherwise adversely affect the employee’s wellbeing.

Accordingly, any employee who has a grievance is encouraged (or required if it relates to a serious issue) to raise it and have it resolved in accordance with the terms of this policy.

If an employee is experiencing any stress or worry in relation to the subject matter of the grievance, they are also encouraged to contact by email the Managing Director.

Under no circumstances should employees respond to inappropriate behaviour with other inappropriate behavior.

**Grevance Résolution Procédure**

There are two options in resolving a grievance:

* Self-management; and
* Making a complaint.

These options are not mutually exclusive, and hence, it may be that a grievance is ultimately resolved by recourse to both options (undertaken consecutively commencing with option 1). More information about these options is set out below.

Nothing in this policy prevents Alseasons Hospitality Staff intervening and taking reasonable action in addressing a workplace issue, whether or not it is pursued as a grievance under this policy.

**Option 1: Self-Management**

**What:**

Where an employee is aggrieved by an issue, they are encouraged, at first instance, to raise the issue directly with the person(s) involved as soon as possible with the aim of resolving the issue privately and confidentially, provided the employee feels comfortable in doing so. Refer to the “when” section for guidance as to circumstances when Alseasons Hospitality Staff considers it appropriate for an employee to undertake self-management.

Self-management can be an effective early intervention strategy in appropriate cases. It can be beneficial in minimising the potential for minor issues to escalate and maintaining work relationships. Accordingly, Alseasons Hospitality Staff encourages self-management either personally or with the assistance of others, as the first step to resolve an issue.

**When:**

Self-management is suitable:

* For minor, non-complex and one-off issues;
* If the aggrieved employee feels comfortable in addressing the issues directly with other person(s) involved (personally or with the assistance of others);
* The issue is readily able to be resolved promptly and effectively without requiring the intervention of the employer’s representative (e.g. supervisor, manager or human resource professional).

**How:**

Typically, self-management may take the form of the aggrieved employee approaching the other person involved in a private setting and informing that person in a calm and professional manner that the person’s behaviour or action is unfair, unwelcome or unacceptable and seek agreement from that person that the offending behaviour or action will cease or not be repeated. Agreement should be obtained to keep the matter confidential subject to having to disclose the matter to appropriate personnel of Alseasons Hospitality Staff should the matter need to be escalated (i.e. if no resolution is obtained from self-management) or otherwise if the employees involved would be obligated to disclose the issue having regard to its subject matter.

If the employee does not feel comfortable in approaching the offending person(s) on their own, they can seek the assistance of following person(s) to raise the issue:

* Aggrieved employee’s manager;
* The other employee’s manager; or
* Talent & Human Resource Manager of Alseasons Hospitality Staff.

Any of the designated persons requested to assist the aggrieved employee should do so unless they have a reasonable basis not to (e.g. conflict of interest), and when assisting must use a confidential and non-confrontational approach when discussing the issue and seeking to have it resolved.

If the issue does not resolve through self-management, the aggrieved employee may escalate the grievance by making a complaint in accordance with this policy (i.e. pursue option 2).

**Option 2: Making a complaint**

A complaint is made by**emailing the details** and forwarding it to Talent & & HR Manger Following which, or the Managing Director will assess the complaint and determine in their discretion whether an Informal Response or Formal Response is warranted in order to resolve the complaint.

However, in determining the appropriate response, Talent & HR Manager/Managing Director should take into account whether the complainant seeks an Informal Response or Formal Response as well as the suitability criteria (see “when” section for each type of response below).

The employee who has made the complaint is a **complainant** and the person(s) in respect of which the complaint is about is the **respondent(s)**.

**Informal Response**

**What:**

An Informal Response will require the intervention of a manager or to resolve the issue(s) raised in the complaint.

It may involve some rudimentary issue analysis and fact gathering (e.g. by the manager informally but confidentially speaking to the offending person to ascertain their side of the story) but would not:

require any (internal or external) investigation (i.e. an investigation typically conducted in accordance with terms of reference, by an independent and qualified investigator, with formal interviews of the aggrieved employee, the person(s) who the complaint is about, and witnesses etc.), or

otherwise a determination of whether alleged conduct or action has occurred, and if so whether there has been any breach of policies, codes, or terms and conditions of employment.

That is, the informal resolution process focuses on finding a satisfactory solution to the issue rather than establishing wrongdoing.

Further, given the approach, the complaint is unlikely to involve a serious issue or lead to significant disciplinary action being taken against any person(s) involved.

The person designated to manage the Informal Response will have the discretion to determine, implement and manage the particular approach to, and the outcomes in, resolving the issue raised in the complaint.

The complainant and respondent(s) are required to cooperate in the management and implementation of, as well as adhere to, reasonable action implemented in accordance with the Informal Response.

The person designated to manage the Informal Response can at any stage of the Informal Response process determine that the complaint should be subject to a Formal Response if that person considers it is appropriate to do so.

**When:**

An Informal Response is suitable:

* For minor to moderately serious issue(s);
* For non-complex factual or legal issue(s);
* In respect of conduct or action that is not considered (upon initial assessment) as entrenched or systemic in nature;
* Where the aggrieved employee does not feel comfortable in undertaking self-management or it is otherwise determined that self-management would not be appropriate in light of the issue(s) raised in the complaint;
* When no investigation would be required;
* When no allegation of systematic bullying, unlawful discrimination or failure to comply with health and safety standards are involved;
* When the aggrieved employee seeks an Informal Response (and Alseasons Hospitality Staff) considers that an Informal Response is warranted);
* It is unlikely that any significant disciplinary action will be taken against any person(s) involved;

**How:**

An Informal Response may be managed by:

* The complainant’s supervisor or manager;
* The other person’s supervisor or manager; or
* Talent HR Manager Human of Alseasons Hospitality Staff.

Once aware of the issue, the person designated to manage the Informal Response can then take appropriate action to address it including as a (likely) next step some issue analysis and fact gathering.

Means of resolving the complaint may include organising training for a person or group, a conciliation or three-way meeting, or a manager counselling the respondent or arranging for counselling session to be conducted by someone else. Guidance as to possible outcomes can be found in section 7 below (although not all will be appropriate for an Informal Response).

The complainant and respondent(s) are required to cooperate in the management and implementation of, as well as adhere to, reasonable action implemented in accordance with the Informal Response.

**Formal Response**

**What:**

A Formal Response is appropriate for a serious issue. The complaint may result in an investigation (internal or external, formal or informal) of the issue raised in the complaint, and as such, this approach may involve possible findings of wrongdoing (and consequently disciplinary action), as well as implementation of appropriate outcomes in resolving the complaint.

The Formal Response process will require the complainant specifying details of the conduct or conditions complained of and the outcome sought.

**When:**

A Formal Response is suitable:

* For a serious issue(s) or allegation(s) (e.g. misconduct, corrupt conduct, unlawful discrimination or harassment, bullying etc.);
* For complex factual or legal issue(s);
* Where systemic or entrenched issues are involved;
* When an investigation (whether that be undertake internally by an appropriately qualified member of staff or by an external entity e.g. law firm) is a warranted
* If some form of Informal Response was undertaken and that response failed to satisfactorily resolve the complaint;
* When the complainant seeks a Formal Response (and Alseasons Hospitality Staff considers that a Formal Response is warranted).

**How:**

If not indicated in the complaint form, the complainant should set out in writing:

* Who the complaint is about;
* What the issues complained about are;
* Details of any information or evidence that support the complaint; and
* What the employee would like done about the situation.

Having considered that a Formal Response is warranted, Alseasons Hospitality Staff will determine the appropriate course of action on a case-by-case basis. This may involve an investigation into the issues complained about.

Where an investigation is to be conducted, Alseasons Hospitality Staff will endeavor to have the investigation conducted thoroughly, impartially and confidentially. An investigation is likely to involve interviews with the complainant, the person or group complained about and any witnesses to the alleged incident or conduct. It is also likely to involve the collation and review of any relevant documents and/or other evidence.

Once completed, both the complainant and the person or people complained about will be informed about the outcome of the investigation, although the investigation report will not be

disclosed, nor will any disciplinary action that may be taken against the respondent or other person(s) involved.

A range of possible outcomes may be implemented. Guidance as to possible outcomes can be found in section 7 below (although not all will be appropriate for a Formal Response).

Alseasons Hospitality Staff will aim to provide both the complainant and the person or persons complained about with sufficient support throughout the complaint resolution process. It will also endeavour to keep them informed of progress and to resolve the matter in a timely manner.

Employees may seek external advice regarding the matter at any point during the complaint resolution process, at the employees’ expense.

**Review**

If the complainant is dissatisfied with the outcome of a complaint (other than in respect of any disciplinary action that may or may not have be taken against the respondent or other person(s) involved), they may seek a review of this matter by contacting Talent HR Manager or The Managing Director they will determine in its discretion the manner and nature of the review to be undertaken, and inform the complainant (and if appropriate, the respondent) of the outcome of the review undertaken.

**Possible outcomes**

Without limiting the outcomes that may be implemented in any case, by way of guidance, potential outcomes in respect of the complaint process include:

* an apology for any harm or offense caused;
* an agreement that inappropriate behaviour will stop or change;
* education or training for a person or group to prevent reoccurrence of the behaviour;
* an counselling or ‘quiet one-to-one chat’ by a manager;
* changed work practices or procedures;
* introduction of new Company policies or a change in policies;
* reinstating a benefit that was denied; and/or
* disciplinary action including a warning, transfer or demotion, or termination of employment or of a contract.

Not all the possible outcomes listed above will be appropriate for each response.

**Support person**

The complainant and respondent to a complaint are entitled to have a support person present to support them during the grievance resolution process (whether that be in the context of an informal or formal response process) if they wish.

If the complainant or respondent wishes to have a support person who is an external party, the person must first seek the approval of the designated person managing the grievance process.

The person designated to manage the response will only object where it is considered unreasonable or unfair to have that person act in that capacity.

The role of the support person (whether that be another employee or external party) will be to attend meetings and interviews to provide support only. They are not permitted to represent or advocate on the party’s behalf or otherwise play an active role in the determination of the complaint.

**Confidentiality**

Alseasons Hospitality Staff will endeavor to maintain confidentiality in relation to complaints received under this Policy as far as reasonably possible. However, the person or people complained about have the right to be informed of the precise nature of the allegation(s) being made about them to enable them to respond to those allegations in the course of an investigation.

**Victimisation**

Any employee who victimises an employee or otherwise subjects the employee to any adverse conduct for raising a grievance under this policy may be subject to disciplinary action.

Victimisation may be against the law, particularly in cases concerning bullying, sexual harassment or unlawful discrimination.

**Malicious or Vexatious Complaints**

It is a serious breach of this policy to lodge a complaint that is known to be false or that is malicious or vexatious. Any such conduct may result in disciplinary action up to and including termination of employment.

Employees should be assured, however, that they will not be subjected to disciplinary action simply because they raise a grievance that Alseasons Hospitality Staffdetermines is unsubstantiated.

**More information**

Should any employee have any queries about this policy.

Contact Talent HR Manager/ Managing Director

or

Fair Work

# Quality Statement

Alseasons is the leading Hospitality Labour Hire agency and is unambiguous about its objective to maintain its reputation for excellence in screening, recruitment and placement of staff.

Alseasons is responsible for providing a physical environment to support our goals through the provision of facilities and services that meet or exceed client requirements.

**Alseasons Hospitality Staff is committed to:**

* Providing customers with high quality services which meet and exceeds their staff booking requirements.
* Enhancing the skills of management and staff through review and actively pursuing an on-going training policy, the objective of which is to prepare staff to perform their work more effectively.
* Promoting the culture of continual quality improvements and the philosophy of getting things “right first time”.
* Rigorously reviewing feedback from both staff and clients and controlling the start of the bookings, right through to completion of the shift.
* Promoting the quality management systems and ensuring implementation is achieved by internal auditing, management review, corrective and preventive action.
* Everyone is responsible for the quality within the company and for maintaining high standards.

# Privacy Policies

You are required to observe and uphold all of the company’s privacy policies and procedures as implemented or varied from time to time.

**Security and Privacy Policy Statement**

Your privacy is important to Alseasons and we will ensure that we take all the necessary measures to protect the information we collect from applicants, clients, suppliers and employees.

We manage personal information in accordance with the Privacy Act 1988 and Australian Privacy Principles.

We only collect information that is reasonably necessary for the proper performance of our activities and/or functions.

We may decline to collect and/or accept unsolicited and or solicited information from/or about you and take steps to purge it from our systems.

By submitting personal information to us and/or any other associated entity of Alseasons you agree to our use of your personal information as described herein. Your use of our websites, APPS and eRoster owned and operated by or on behalf of Alseasons is subject to this Privacy Policy. It is advisable not to use our Electronic Interface if you don’t agree to our Privacy Policy. The personal and sensitive information we will collect.

**Personal**

Formatted in résumé style, or online application details, which will include and not be limited to contact details, work experience, references details and qualifications. Where and when born. TFN and bank account details (for payment purposes), ID and residency status (to comply with the Department of Immigration). We check that the information is current, accurate and complete. This will sometimes mean that we have to cross check the information that we collect from you with third parties. Sometimes we may require your information to be updated and cross check once again with third parties.

**Sensitive Information**

Including but not limited to health information, criminal records, trade association or membership of a trade union. Sensitive information will only be disclosed with your consent.

**Collection of Information by way of**

Electronic (email) or hard copy application forms and/or résumés by email, fax, post, in person, via current or previous employers, government agencies, clients, competency tests, health practitioners, and where we deem fit.

**The Purpose of Collecting Information**

So we can perform our business activities and functions and to provide the best possible quality of service to you. To comply with any law or regulation and/or in cooperation with any government authority.

**Holding and Storage of Information**

Safeguarding information is paramount to Alseasons and information about you or that affects you will be stored on our database, however some documentation will be paper stored. Information will only be stored to conform to government laws and regulations. Some documents and data base information may be destroyed when we consider the information is no longer required or needed. Electronically stored documents are safeguarded by passwords, paper documents are securely stored. Alseasons operates a “Clean Desk” approach so no paper documents are left on desks. Paper documents are destroyed by shredding.

**Disclosure of Information**

We may disclose your personal information to: our consultants in the office, clients, to administer, authorised government and legal departments and agencies.

**Changing and Accessing your Details**

You can access personal information we hold about you at anytime by contacting us. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing the information within 7 (seven) working days.

Should you require changes to be made about information about yourself, we may require written evidence to comply with your instructions and/or government and legal agencies.

If we cannot accommodate your requirement due to interference with the privacy of others or if it would result in a breach of confidentially or law, will we not be required to grant you access.

Evaluative opinion material obtained confidentially in the course of our performing reference checks. And access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we will collect under obligations of confidentially that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentially.

We may change this policy from time to time and all personal information held by us will be governed by the most recent version of our Privacy Policy and amendments will appear on our webpage and notifications by newsletter and or emails.

**Information by Direct Marketing**

All contractors, workers and staff will receive by Electronic (email) or hard copy information on Industry news and updates, marketing information on Alseasons and general newsletters. Until you close your file by contacting Alseasons and requesting that no further information and or marketing material is required, you then abide by our agreement to accept the above information.

Photo images of you can be used by our marketing department unless you inform Alseasons in writing that you do not want your photo used in any Alseasons publication and that you will not pose or stand or be present in any photo shots, otherwise you agree that the above all photos taken by Alseasons will become the property of Alseaons and used at their discretion.

**Complaints**

If you have a request for information that is currently held by, or a complaint regarding information held by Alseasons, please address the query in writing.

When we receive the information, we will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint.

Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy.

We may ask for further clarification of the complaint and ask for further details

We will consider the complaint and may make inquiries of people who can assist us to establish what happened and why.

If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response.

Contact details

The Director

Alseasons Hospitality Staff Pty Ltd

Level 6 225 Clarence Street

Sydney NSW 2000

Or

E-mail info@alseasons.com.au

Further information can be obtained through:

Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au)

# Alseasons Whistle-blower Policy

**Application**

This policy applies to Whistle-blowers, who can be employees as well as others with a connection to Alseasons such as clients, contractors, suppliers, or a relative or dependent of these individuals or their spouse. This policy also applies to Alseasons, directors and employees.

Alseasons is subject to applicable laws. If any laws are in any way inconsistent with this policy, or impose a higher level of protection than this policy, those laws take precedence in that jurisdiction to the extent of the inconsistency.

This policy does not form part of any contract of employment or any industrial instrument.

**Requirement**

This policy provides for processes and protections provided by Alseasons regarding the disclosure of Reportable Conduct.

Alseasons must comply with the obligations relating to protection of whistle-blowers in the Corporations Act 2001 and equivalent legislation in other jurisdictions.

**Purpose**

At Alseasons, our Code of Conduct emphasises the importance of speaking up as a critical component of our values and expectations. We are committed to fostering a culture where you feel safe to speak up on matters that concern you. You are encouraged to speak up if you observe or suspect conduct that concerns you. We will support you throughout raising a concern and do not tolerate any form of retaliation or victimisation as a result of you speaking up in accordance with this policy.

This policy aims to provide clarity on how Alseasons supports you so that you:

* Are encouraged to express your concerns;
* Know how to express your concerns;
* Know what will happen when you express your concerns; and
* Feel safe in expressing your concerns.

**Who Is Able to Make a Protected Disclosure**

You will be protected if you are an “*eligible whistleblower*” and you have disclosed information about a “*disclosable matter*” to a correct recipient.

This section identifies the different types of people, both within and outside Alseasons who can make a disclosure that qualifies for protection under the *Corporations Act 2001* (i.e., “*eligible whistleblowers*”).

**Who Can Be An Eligible Whistleblower**

**“Insiders” as Eligible Whistleblowers**

An individual is an eligible whistleblower in relation to an entity to which this policy applies if the individual is or has been any of the following:

* An officer or employee of the entity (e.g. current and former employees who are permanent, part-time, fixed-term or temporary, on-hire, interns, secondees, managers, and directors);
* A supplier of services or goods to the entity (whether paid or unpaid), including their employees (e.g. current and former (independent) contractors, consultants, service providers and business partners);
* An associate of the entity; and
* A relative, dependant or spouse of an individual (e.g. relatives, dependants or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

**Competitors Are Not Eligible Whistleblowers**

Although a competitor might be affected by misconduct or an improper state of affairs or circumstances, they mostly cannot access the whistleblower protections under the *Corporations Act* because those protections are targeted at “insiders” of companies.

However, competitors may have rights under other laws (or they may also be suppliers). If you are a competitor, we encourage you to report your concerns to ASIC (Australian Securities & Investments Commission). Remember, reports made to RCSA do not attract whistleblower protections under the *Corporations Act* but they may be confidential under other measures. We also encourage you to seek your own independent legal advice.

**Customers and Clients Are Not Eligible Whistleblowers**

Although a customer or client might be affected by misconduct or an improper state of affairs or circumstances, they mostly cannot access the whistleblower protections under the *Corporations Act* because those protections are targeted at “insiders” of companies.

However, customers and clients may have rights under other laws. Some customers may also be suppliers in some circumstances. If you are a customer or client, we encourage you to report your concerns to ASIC. We also encourage you to seek your own independent legal advice.

**Disclosable Matters Covered By This Policy**

Disclosable matters involve information which a whistleblower has reasonable grounds to suspect concerns misconduct or an *improper state of affairs or circumstances* in relation to an entity to which this policy applies.

Disclosures made by an “*eligible whistleblower*” about “*disclosable matters*” to a correct recipient qualify for protection under the *Corporations Act*.

A disclosure may still qualify for protection even if it turns out to be incorrect. However, disclosures that are made without reasonable grounds – e.g. by way of a personal opinion or mere allegation with no supporting information are unlikely to qualify for protection.

Disclosures that are not about disclosable matters do not qualify for protection under the *Corporations Act*.

Some types of disclosures – e.g. personal work related grievances – do not qualify for protection under the *Corporations Act 2001*. However, they might be protected under other legislation, such as the *Fair Work Act 2009*.

This section provides more information about the types of matters that can be disclosed under this policy.

**Misconduct and an Improper State of Affairs or Circumstances**

Misconduct includes fraud, negligence, default, breach of trust and breach of duty.

Many different types of conduct could amount to an “*improper state of affairs*” concerning an entity to which this policy applies.

For example, an “*improper state of affairs or circumstances*” might not involve unlawful conduct in relation to the entity but may indicate a systemic issue that a relevant regulator should know about to properly perform its functions. It may also relate to business behaviour and practices that might cause consumer harm.

**Broad Examples**

Some broad examples of misconduct or an improper state of affairs or circumstances would be:

* Illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
* Fraud, money laundering or misappropriation of funds;
* Offering or accepting a bribe;
* Financial irregularities;
* Failure to comply with, or breach of, legal or regulatory requirements;
* Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
* Conduct that constitutes a significant risk to public safety; and
* Misconduct or an improper state of affairs or circumstances in relation to the tax affairs of an entity to which this policy applies (e.g. involvement in tax avoidance through cash payments).

**Specific Examples**

Some more specific examples of misconduct or an improper state of affairs or circumstances would be:

* Unsafe work practices;
* Unsafe or unhealthy accommodation provided or procured in connection with work;
* Exploitation within the meaning of the *Criminal Code Act* including:
* Slavery, or a condition similar to slavery;
* Servitude;
* Forced labour;
* forced marriage;
* debt bondage;
* threats to have a person’s visa cancelled by authorities;
* withholding of a visa holder’s passport;
* pressure to work beyond the restrictions of a visa;
* prohibited up-front payment or ‘deposit’ for a job;
* involvement in people trafficking;
* “wage theft”;
* “sham contracting”;
* involvement in unlicensed labour hire supply arrangements or avoidance schemes (where licences are required);
* involvement in unlicensed private employment agency activity (where licences are required);
* unconscionable conduct either within the meaning of the common law or under the *Australian Consumer Law*, including:
* exploitation of vulnerability or weakness;
* abuse of positions of trust or confidence;
* insistence upon rights in circumstances which make that insistence harsh or oppressive;
* unequitable denial of legal obligations; or
* unjust retention of property;
* misleading or deceptive conduct – e.g. in relation to job ads or job “scams”; and
* cartel and other anti-competitive conduct in contravention of the *Competition and Consumer Act.*

**Tax Disclosures**

To qualify for protection under the tax whistleblower regime, an eligible whistleblower must have reasonable grounds to suspect that the information indicates misconduct or an improper state of affairs or circumstances with respect to the tax affairs of the entity.

For further information about the protections under the tax whistleblower regime, see the Australian Taxation Office’s webpage on tax whistleblowers.

**Disclosure About Matters Not Covered By This Policy**

Some types of disclosure are not covered by this policy. However, they may still be protected under other legislation such as the *Fair Work Act 2009*.

**Personal Work-Related Grievances**

Disclosures relating to “*personal work related grievances*” do not qualify for protection under the *Corporations Act*.

Personal work related grievances are those that relate to the whistleblower’s current or former employment and have, or tend to have, implications for the whistleblower personally, but do not:

* have any other significant implications for the entity (or another entity); or
* relate to any conduct, or alleged conduct, about a disclosable matter.

Some examples of personal work related grievances would be a grievance about:

* an interpersonal conflict between the whistleblower and another employee;
* a decision that does not involve a breach of workplace laws;
* a decision about the engagement, transfer or promotion of the whistleblower;
* a decision about the terms and conditions of engagement of the whistleblower; and
* a decision to suspend or terminate the engagement of the whistleblower, or otherwise to discipline the whistleblower.

A disclosure about such a matter will still qualify for protection if:

* it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
* the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the whistleblower’s personal circumstances;
* the whistleblower suffers from or is threatened with detriment for making a disclosure; or
* the whistleblower seeks legal advice or legal representation about the operation of the whistleblower protections under the *Corporations Act*.

**Who Can Receive A Disclosure**

This section sets out information about who can receive disclosures that qualify for protection by identifying the types of people within and outside Alseasons who can receive information about disclosable matters.

You need to make a disclosure directly to a proper recipient to be able to qualify for protection as a whistleblower under the *Corporations Act* (or *Taxation Administration Act*, where relevant).

Proper recipients include:

* people within and outside our organisation who have statutory authority because of their position to receive disclosures or whom we have expressly authorised. We refer to these people as ***eligible recipients***
* legal practitioners in some circumstances
* certain regulatory bodies
* for public interest disclosures or emergency disclosures, in limited circumstances, certain journalists or parliamentarians.

We would like to identify and address concerns about misconduct or an improper state of affairs or circumstances as early as possible. We therefore encourage you to make your disclosures to one of our authorised internal or external eligible recipients in the first instance if you feel comfortable to do so.

**Authorised Internal and External Eligible Recipients**

Eligible recipients authorised to receive disclosures relating to Alseasons include:

* a director of Alseasons or a related body corporate;
* an internal or external auditor (including a member of an audit team conducting an audit) or actuary of Alseasons or a related body corporate; and
* a person authorised by Alseasons to receive disclosures that may qualify for protection.

**Legal Practitioners**

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the *Corporations Act* are protected (even if the legal practitioner concludes that a disclosure does not relate to a “disclosable matter”).

**Regulatory Bodies**

Disclosures of information relating to disclosable matters can be made to ASIC, the Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by regulation and qualify for protection under the *Corporations Act*.

You can also make disclosure about tax affairs to the ATO and qualify for protection.

**Public Interest Disclosures And Emergency Disclosures**

Information about disclosable matters can be disclosed to a journalist or parliamentarian under certain circumstances and qualify for protection.

***Public Interest Disclosures*** (i.e. where you have reasonable grounds to believe your disclosure is in the public interest) and ***Emergency Disclosures*** (i.e. where you have reasonable grounds to believe that your information concerns a substantial and imminent danger to the health or safety of one or more people or the natural environment) must have previously been made to ASIC, APRA, or a prescribed body and written notice needs to have been provided to the body to which the disclosure was made.

In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure.

It is important that you understand the conditions for making such disclosures and you should contact an independent legal adviser before making a public interest disclosure or an emergency disclosure.

**How To Make A Disclosure**

This section sets out how to make a disclosure and includes a range of internal and external disclosure options to allow disclosures to be made anonymously and/or confidentially, securely and outside business hours.

The information which you provide should be factual and should be supported by evidence. For example, do not say merely, “*I was bullied*”. Describe the conduct that constituted the bullying, being as specific as you can. Do not say, merely, “*I was exploited*” or, “*I was discriminated against*”. Describe the conduct that amounted to the exploitation or the discrimination.

It will help if you can provide details of times, dates, conversations, people involved and places where events occurred. It will also help us to focus on the substance of your disclosure if you can provide documents that support your disclosure.

Providing accurate and good quality information can help us to understand the substance of your disclosure and will result in a greater likelihood that it will be accepted as eligible for protection, rather than being dismissed as a false disclosure or one that is trivial, frivolous, or vexatious.

**Anonymous Disclosures**

Disclosures can be made anonymously and still be protected under the *Corporations Act*.

You can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.

You can also refuse to answer questions that you feel could reveal your identity at any time, including during follow-up conversations.

**Legal Protections For Whisteblowers**

This section sets out information about the protections under the *Corporations Act* that are available to eligible whistleblowers.

Whistleblower protections apply not only to internal disclosures, but also to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the *Corporations Act*.

**Identity Protection (Confidentiality)**

We are under legal obligations to protect the confidentiality of a whistleblower’s identity. Subject to some exceptions, it is illegal to identify a whistleblower or to disclose information that is likely to lead to the identification of a whistleblower whose identity is protected by the obligation of confidentiality.

There are some exceptions that allow a whistleblower’s identity to be disclosed to certain regulators, a legal practitioner, and persons or bodies prescribed by regulations.

A whistleblower’s identity can also be disclosed with proper consent of the whistleblower.

We may disclose information that a whistleblower has given us without the whistleblower’s consent provided that:

* the information does not include the whistleblower’s identity;
* we have taken all reasonable steps to reduce the risk that the whistleblower will be identified from the information; *and* it is reasonably necessary for investigating the issues raised in the disclosure.

You can raise concerns or a grievance about our handling of the confidentiality of your identity or disclosure with:

* one of our Whistleblower Protection Officers
* a legal practitioner; or
* a relevant regulator – e.g. ASIC, APRA or the ATO.

**Protection From Detrimental Acts or Omissions**

Eligible whistleblowers have the benefit of legal protections from detrimental acts or omissions (*detriment*) in relation to a disclosure.

* A person is not permitted to engage in conduct that causes detriment to a whistleblower (or another person), in relation to a disclosure, if: the person believes or suspects that the whistleblower (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; *and*
* the belief or suspicion is the reason, or part of the reason, for the conduct.
* In addition, a person cannot make a threat to cause detriment to a whistleblower (or another person) in relation to a disclosure.

Detriment is a broad concept that could include any of the following and more:

dismissal of an employee;

* injury of an employee in his or her employment;
* alteration of an employee’s position or duties to his or her disadvantage;
* discrimination between an employee and other employees of the same employer;
* harassment or intimidation of a person;
* harm or injury to a person, including psychological harm;
* damage to a person’s property;
* damage to a person’s reputation; or
* damage to a person’s business or financial position.

On the other hand, some conduct may have adverse consequences for a whistleblower, but would not be regarded as detriment. Examples could include:

* administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g. moving a whistleblower who has made a disclosure about their immediate work area to another office to prevent them from detriment); or
* managing a whistleblower’s unsatisfactory work performance, if the action is in line with the entity’s usual performance management framework.

**Compensation and Other Remedies**

A whistleblower (or any other employee or person) can seek compensation and other remedies through the courts if:

* they suffer loss, damage or injury because of a disclosure; and
* the entity in relation to which the disclosure was made failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

If you think you might have a right to compensation or other remedies, you should seek independent legal advice.

**Civil, Criminal and Administrative Liability Protection**

An eligible whistleblower is protected from any of the following in relation to their disclosure:

* civil liability (e.g. any legal action against the whistleblower for breach of an employment contract, duty of confidentiality or another contractual obligation);
* criminal liability (e.g. attempted prosecution of the whistleblower for unlawfully releasing information, or other use of the disclosure against the whistleblower in a prosecution (other than for making a false disclosure)); and
* administrative liability (e.g. disciplinary action for making the disclosure).

However, the protections do not grant immunity for any misconduct a whistleblower has engaged in that is revealed in their disclosure.

If you think you might be entitled to claim immunity – e.g. by claiming a “marker” and immunity under the ACCC’s *immunity and cooperation policy for cartel conduct - October 2019* – you should seek independent legal advice about how to protect your rights and advance your claim.

**Overview**

This section sets out information about how we will support eligible whistleblowers and protect them against disclosure of their identity and detriment.

You can raise concerns or a grievance about our handling of the confidentiality of your identity or disclosure or about the risk of detriments arising from disclosure with:

* one of our Whistleblower Protection Officers;
* our External Independent Whistleblowing Service Provider if we have appointed one;
* a legal practitioner; or
* a relevant regulator – e.g. ASIC, APRA or the ATO.

**Identity Protection (Confidentiality)**

In practice, we will protect the confidentiality of an eligible whistleblower’s identity by:

* storing original documents securely and using sanitised, redacted and anonymised/ pseudonymised PDF documents in their place wherever is practicable to do so when handling a whistleblowing matter;
* using gender neutral language;
* ensuring that disclosures are handled by trained and qualified internal staff or external providers;
* limiting access to information about the whistleblowing matter on a “need-to-know” basis;
* confirming appropriateness and consent to use designated communication channels when handling whistleblowing matters;
* labelling documents produced in the course of handling whistleblowing matters, “Whistleblowing Confidential”;
* encouraging within the organisation a culture of respect for disclosure and whistleblowers; taking appropriate action, within our power to do so, against anyone involved in breaching or compromising confidentiality;
* encouraging whistleblowers to engage with our Whistleblower Protection Officers and other relevant persons (e.g. their lawyers) about any concerns they might have regarding the risk of identity disclosure or detriment;
* proactively discouraging speculation, guessing, and gossip about the identity of whistleblowers if it should come to our attention;
* encouraging engagement with external providers – e.g. lawyers, risk & governance consultants, external independent whistleblowing service providers, and your authorised external eligible recipients – where our risk assessment procedures indicate that it is advisable and practicable to do so;
* taking appropriate action, including legal action as may be indicated and advised, against any person involved in a breach of confidentiality in order to minimise and remediate any harm that may be suffered in consequence of the breach.

**Protections from Detrimental Acts or Omissions**

Upon receiving notice of a disclosable matter, we or our authorised external eligible recipients will:

* Undertake, or procure to be undertaken, a preliminary risk assessment with regard to the likelihood and severity of risks of identity disclosure and detriment;
* Determine (in consultation with you) a strategy to control the risks and provide support;
* Seek your consent to the risk control and support strategy.

Risk controls and support measures are likely to vary from case to case but may include:

* Referral to appropriate support services (including counselling or other professional or legal services);
* Variation in duties, reporting arrangements, times or the place where work is to be performed;
* Separation of people and processes involved in any concurrent performance review or disciplinary process;
* Appropriate use of “ethical walls”;
* Encouraging within the organisation a culture of respect for disclosure and whistleblowers;
* Taking appropriate action, within our power to do so, against anyone involved in causing detriment to a whistleblower, or compromising whistleblower protections;
* Encouraging whistleblowers to engage with our Whistleblower Protection Officers and other relevant persons (e.g. their lawyers) about any concerns they might have regarding the risk of detriment;
* Encouraging engagement with external providers – e.g. lawyers, risk & governance consultants, external independent whistleblowing service providers, and authorised external eligible recipients – where our risk assessment procedures indicate that it is advisable and practicable to do so;
* Taking appropriate action, including legal action as may be indicated and advised, against any person involved in causing or contributing to detriment to a whistleblower in order to minimise and remediate any harm that may be suffered in consequence of the detriment.

Please note that some circumstances may require us to implement risk controls without your consent, and with only limited consultation – e.g. in cases of urgency.

Our risk assessments will be reviewed regularly as may be necessary during the handling of a whistleblower disclosure.

**Handling and Investigating Disclosures**

*Not every disclosure will require or warrant a formal* *investigation* and not every disclosure will be amenable to formal investigation because the scope of our power (and that of our external eligible recipients and service providers) is limited – i.e. they have no statutory powers of investigation such as a regulator may have.

Some disclosures may warrant only a broad review of the subject matter or work area disclosed.

Some disclosures might be appropriately addressed by corrective action procedures applicable under our quality management and professional service delivery management systems and certifications or under the governance frameworks of workforce programs in which we participate.

Some disclosures may raise professional conduct matters under RCSA’s Code for Professional Conduct and might be appropriately addressed by pathways available under RCSA’s Professional Conduct Grievance Intervention Guidelines.

Regardless of whether a disclosure is formally investigated or not, we will take the measures to ensure the confidentiality of information collected in the course of handling the matter.

**Key Steps on Receipt of Disclosure**

The steps which we would take on receipt of a disclosure, and the sequence in which we would take them, may vary depending on the source from which we receive notice of the disclosure – e.g. notice that a disclosure has been made might come to us from an authorised external eligible recipient or from a regulator.

If notice of a disclosure comes to us directly from you, being the person making it, we would take the steps outlined below within the indicated timeframes wherever practicable.

If there are circumstances that warrant greater urgency, you are encouraged to tell us (or an eligible recipient) about them when providing your notification.

**First Response (within 1 business day)**

1. Log the time and date the disclosure was received.
2. Decide if, on the face of it, it qualifies for protection under the *Corporations Act* (or the *Tax Administration Act*, where relevant). We will adopt a “precautionary approach” assuming, until we can confirm otherwise, that it does qualify.
3. Immediately commence to apply confidentiality measures outlined of this policy.
4. Appoint an internal case manager.
5. Confirm the suitability of communication channels and protocols with you.
6. Confirm as soon as practicable whether the disclosure qualifies for protection under the *Corporations Act* and advise you accordingly.

**Additional Steps if the Disclosure Qualifies for Protection (within 3 business days of, receipt):**

1. Decide upon the appropriate means of addressing the matters raised in your disclosure and advise you accordingly.
2. Seek from you any additional information that may be necessary to allow us to undertake the preliminary risk assessment described in this policy.
3. Undertake the preliminary risk assessment with regard to the likelihood and severity of risks of identity disclosure and detriment.
4. Determine (in consultation with you) a strategy to control the risks and provide support.
5. Seek your consent to the risk control and support strategy.
6. Commence to implement the risk control and support strategy and other protective measures outlined in *Protection from Detriments* of this policy.
7. Inform RCSA (or another professional or industry body to whom we might owe disclosure obligations), subject to observing protections against disclosure of identity, if not contra-indicated by our preliminary risk assessment and otherwise required of us, of the misconduct or improper state of affairs or circumstances raised by the disclosure.

Inform our insurers, subject to observing protections against disclosure of identity, if not contra-indicated by our preliminary risk assessment and otherwise required of us, of the misconduct or improper state of affairs or circumstances raised by the disclosure *but only if* we are required to do so under terms of our relevant insurance policy – e.g. a directors & officers policy of insurance.

Provide an indicative timeframe for taking any additional steps required to address the matters raised in the disclosure.

**Key Steps in Investigating a Disclosure**

Depending on the circumstances, investigation of information provided in an eligible disclosure might proceed as:

* a formal investigation carried out by a regulator – e.g. ASIC or the ACCC, in which case the relevant regulator would be best placed to provide information about the key steps;
* an investigation carried out by a third party certification body – e.g. the certifier of a quality management system, in which case the certification body would be best placed to provide information about the key steps;
* an investigation or other intervention conducted by RCSA under its Code for Professional Conduct and Professional Conduct Grievance Intervention Guidelines – in which case RCSA would be best placed to provide information about the key steps;
* an investigation carried out or directed by the co-ordinating body for a workforce program in which we participate – in which case the co-ordinating body would be best placed to provide information about the key steps;

an investigation carried out by us or on our behalf by our lawyers or an external independent whistleblowing service provider – in which case the key steps would be as set out below.

The steps may vary depending on the nature of the matters disclosed and the ability to obtain information that may be needed to complete an investigation.

**Investigations By Us Or Conducted On Our Behalf**

* Appoint a suitably qualified independent investigator.
* Confirm measures to ensure confidentiality.
* Confirm measures to protect against detriments.
* Prepare an investigation plan that states its objective and any particular question or issue that needs to be answered or resolved. The principal objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported.
* Confirm a timetable for the investigation plan.
* Obtain information and advice in accordance with the investigation plan, including conducting necessary witness interviews and obtaining technical, financial or legal advice to support the investigation.
* Review the evidence.
* Prepare an investigation report.
* Review and sign-off on the report.

**Timeframe**

We would aim to complete an investigation conducted by us or on our behalf within one calendar month of determining that the disclosure is appropriate for investigation. Some investigations may take longer depending on what is involved and upon the level of co-operation with our investigation.

**Keeping Whistleblowers Informed**

We will ensure that whistleblowers are provided with regular updates, if they can be contacted (including through anonymous channels). The frequency and timeframe for updates may vary depending on the nature of the disclosure and the progress of the investigation.

You might expect updates at key milestones during the investigation. Key milestones for updates would usually be:

* decision to investigate;
* appointment of investigator;
* commencement of investigation;
* completion of investigation;
* sign off on report.

**Documentation and Reporting of Findings**

**Record and Document Control**

Information collected in the course of an investigation conducted will be recorded and documented in accordance with the following controls:

#### Distinctive

Records and documents should be distinctively identified and described – including by time, date and version.

#### Format and Media

Records and documents should be kept in formats and media appropriate to their content, intended use, and archival needs.

#### Integrity

Records and documents should be appropriately protected from loss of integrity – e.g. loss of integrity by corruption, loss of confidentiality, improper use.

#### Source and Authorship

Source and authorship of records and documents should be recorded and assured.

#### Retention

Records and documents should be preserved in accordance with relevant retention and preservation requirements.

**Report Findings**

Findings of investigations conducted will be documented in a confidential in PDF format, suitably sanitised, redacted, anonymised/ pseudonymised and pass-word protected.

Reports are to include:

* A timeline of the steps taken in the investigation.
* Any findings of fact and any expert opinion adopted in reaching any conclusions;
* Sufficient reasons leading to the answers or resolutions to questions and issues posed in the investigation plan or subsequently arising in the course of the investigation;
* What portions may be disclosed and to whom (including the whistleblower), consistently with the need to preserve confidentiality and protect against detriments.

Reports may, but need not, include recommendations for further actions.

**Fair Treatment Measures of Individuals Mentioned In Disclosures**

Disclosures will be handled confidentially, when it is practical and appropriate in the circumstances.

Each disclosure made to us will be assessed as provided in this policy and may be the subject of an investigation.

Investigations will be conducted within the scope of the objectives, questions and issues identified in the investigation plan.

An employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and, if reasonably practicable to do so, prior to any actions being taken—for example, if the disclosure will be the subject of an investigation.

An employee who is the subject of a disclosure may contact our Whistleblower Protection Officer to enquire about support services that are available and is encouraged to seek independent legal advice.

**Availability, Education & Training, and Accessibility**

**Internal Whistleblowers**

The CEO (or specifically delegated Senior Management) shall ensure that this policy is widely disseminated to, and easily accessible by, our officers and employees (including its staff in overseas based operations) by suitable measures including:

* Holding staff briefing sessions and/or smaller team meetings;
* Posting the policy on the staff intranet or other communication platform;
* Posting information on staff noticeboards;
* Setting out the policy in the employee handbook;
* Incorporating the policy in employee induction information packs and training for new starters; and
* Providing upfront and regular ongoing education and up-to-date training to all staff suitable to their responsibilities and training needs.

**External Whistleblowers**

We will ensure that this policy is available to external whistleblowers by providing a version of it on our website.

# Modern Slavery Policy

This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

It is consistent with our Ethical Framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with the Fundamental Principles and broader Movement policies. As a result, this Modern Slavery Policy is part of the Ethical Framework.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the Modern Slavery Act 2018.

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom.

Modern Slavery Act 2018 being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).

**What is modern slavery?**

Modern slavery is defined by the Modern Slavery Act 2018 to include eight types of serious exploitation and which can be understood as:

1. Trafficking in persons, which is the recruitment, harboring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs;

2. Slavery, which is where the offender exercises powers of ownership over the victim;

3. Servitude which is where the victim’s personal freedom is significantly restricted and they are not free to stop working or leave their place of work;

4. Forced labor, which is where the victim is either not free to stop working or not free to

leave their place of work;

5. Forced marriage, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;

6. Debt bondage, which is where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;

7. The worst forms of child labor, which involves situations where children are: exploited

through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs;

8. Deceptive recruiting for labor or services which is where the victim is deceived about whether they will be exploited through a type of modern slavery can also extend to:

* Entering into a commercial transaction involving a slave;
* Exercising control or direction over, or providing finance for, any commercial transaction
* involving a slave or act of slave trading;
* Conducting a business involving servitude or forced labor (including exercising control over the business or providing finance to it).

Alseasons approach to limiting the risk of modern slavery practices within our supply chains and operations and we expect all organizations we engage with to do the same.

Suppliers must use best endeavors to ensure that there is no modern slavery in their supply chains and operations. In the event suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk.

Suppliers must notify Alseasons as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Alseasons will actively and progressively improve our understanding and oversight of all tiers of our operations.

Our approach to reducing the risk of modern slavery practices within our supply chains and operations. The policy provides guidance on the steps Alseasons takes to work with suppliers to reduce risks and the range of supports available for when an Alseasons person becomes aware that someone is at risk of or affected by modern slavery practices.

When existing policies undergo policy review or new polices are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

No investment should knowingly be made in companies who engage in activities or services which could be directly viewed as considerably compromising these fundamental principles.

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and Modern Slavery Policy and occupational health and safety law.

Alseasons staff who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organization due diligence tool and processes.

Alseasons provides training and education resources for humanitarian impacts of modern slavery.

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from suppliers, partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

A key part of supporting ethical standards is enabling Alseasons, including suppliers’ partners, staff and clients to feel free and safe to speak up when there are reasonable grounds to suspect or have concerns about the compliance or unethical issues or illegal activities by reporting them in accordance with Alseasons Whistleblower Policy.

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.