



WHISTLEBLOWING POLICY

Making a Disclosure in the Public Interest

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Introduction

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner.

It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information that they believe shows serious malpractice or wrongdoing within this organisation, then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Innovate Dorset Ltd endorsed the provisions set out in this document so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

This policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions that are taken by the Company Director or Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

Scope of Policy

This policy is to inform employees of the Company to raise concerns internally at a high level and disclose information that the individual believes shows malpractice or impropriety.

This policy is intended to cover concerns that are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g., disciplinary.

These concerns could include:

- Financial malpractice or impropriety or fraud.
- Failure to comply with a legal obligation or Statutes.
- Dangers to Health & Safety or the environment.
- Criminal activity.
- Improper conduct or unethical behavior.
- Attempts to conceal any of the above.

Safeguards

i. Protection

This policy will offer protection to those employees of Innovate Dorset Ltd who disclose such concerns provided the disclosure is made in good faith, and in the reasonable belief of the individual making the disclosure, that they intend to show malpractice or impropriety, and if they make the disclosure to the appropriate person. The Company Director Kevin Tatchell k.tatchell@innovatedorset.co.uk

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

ii. Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement to the police as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name on any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company Director. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual.

In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

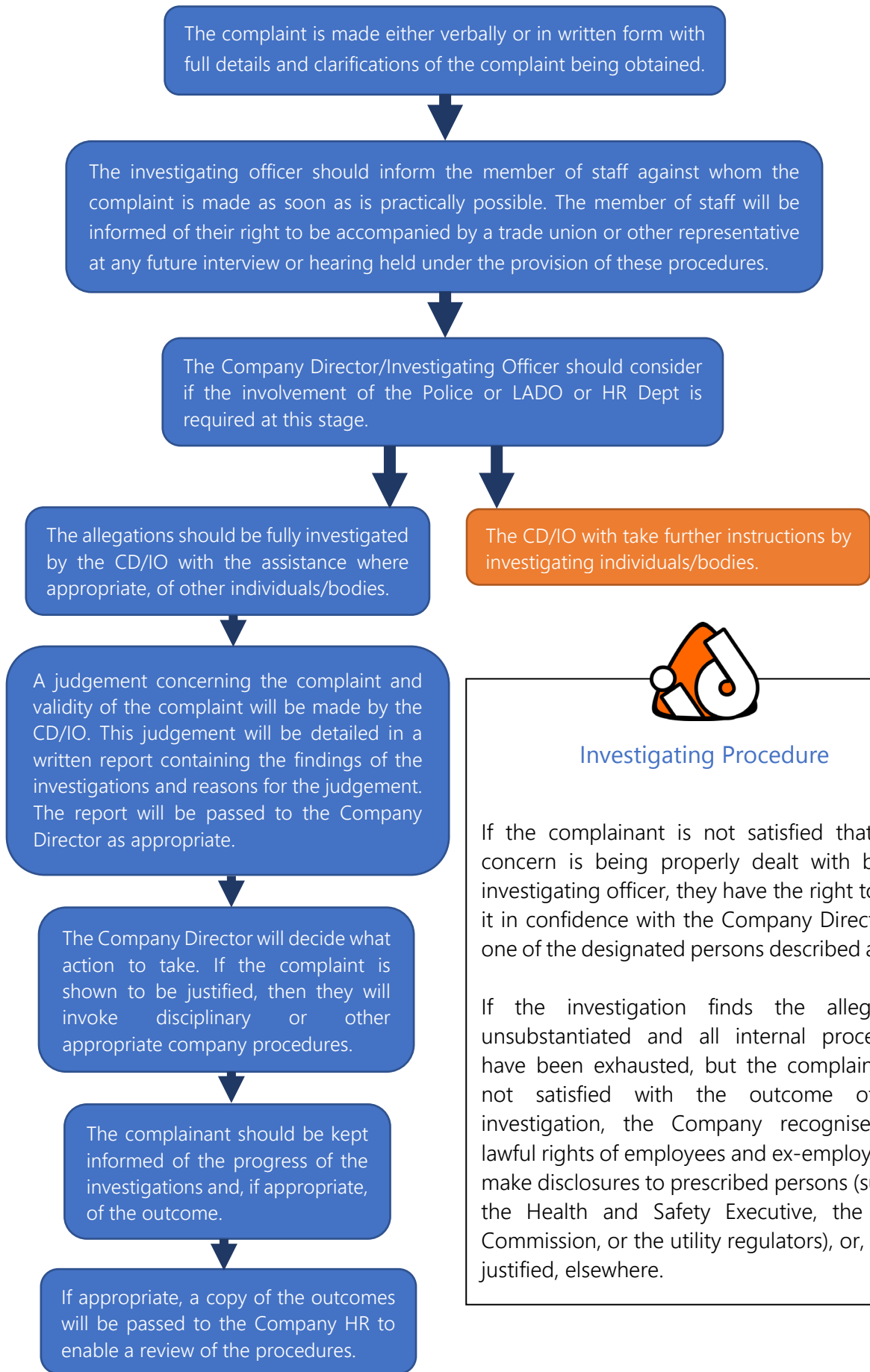
On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Company Director; unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, complaints against the Director should be passed to a nominated appropriate investigating officer, appointed by the Company Director.
- The Company Director may also appoint a person of Senior Management to investigate complaints on their behalf.
- If there is evidence of criminal activity, then the investigating officer should inform the Police. The Company Director and Management will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or the Police, or LADO, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

- The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant. Thereafter report back to them in writing the outcome of the investigation and the action that is proposed.
- If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.
- All responses to the complainant should be in writing and sent to their home address.



Investigating Procedure

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Company Director, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

Control Sheet

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Signed on behalf of Innovate Dorset Ltd

Sign:  Date: 10/06/2021