



Dove Nest Group Whistleblowing Policy

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DOVE NEST GROUP POLICIES AND PROCEDURES

1. Introduction

A whistleblower defined by this policy is any employee of Dove Nest Group, part or full time, who reports an activity they consider to be illegal, dishonest, unethical or otherwise in conflict with the Dove Nest Group Values. Examples would include violation of UK law, billing for services not performed, or other fraudulent financial activity.

The whistleblower is not responsible for investigating the activity, nor for making judgement on the activity or implementing corrective measures. However, there must be clear and prompt communication between Dove Nest and the whistleblower, and the whistleblower's expectations on action and resolution should be managed on a case-by-case basis.

Dove Nest is committed to training workers at all levels in the organisation on their rights relating to whistleblowing. All disclosures must be treated consistently and fairly, and in accordance with the whistleblowing law. The confidentiality of the whistleblower must be maintained where it is requested, unless breaking of the confidentiality is necessary by law.

2. Safeguards

Protection: The policy is designed to offer protection to Dove Nest employees who disclose activities, provided the disclosure is made in good faith and in the reasonable belief that the disclosure shows malpractice or impropriety. Note no protection is offered to those who choose not to use the procedure.

Confidentiality: Dove Nest will treat all whistleblowing 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 as part of the evidence required.

Anonymous Allegations: The policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation.

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 allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

3. Procedures for Whistleblowing

Procedures

Whistleblowing complaints can be made by any staff member to their line manager or to any director. On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint must pass this information on as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by an appropriate Director unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to the Chairperson for referral.
- In the case of a complaint, which is any way connected with but not against the Director, the Chairperson will nominate a Senior Manager or external party to act as the alternative investigating officer.
- Complaints against the Chairperson should be passed to Human Resources who will nominate an appropriate internal / external investigating officer.

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- The whistleblower has the right to bypass the line management structure and take their complaint direct to the Chairperson. The Chairperson has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

Should none of the above routes be suitable or acceptable to the whistleblower, then the whistleblower may approach the following individual who has been designated as the independent point of contact under this procedure. They can advise the whistleblower on the implications of the legislation and the possible internal and external avenues of complaint open to them:

Ben Hansford – 07885 426 376

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Evidence is not required in order for a whistleblowing concern to be raised, though it may aid in the investigation and resolution.

Note anonymous whistleblowers will normally not be able to receive feedback and action taken to look into a disclosure could be limited.

Victimisation of a whistleblower is unacceptable under any situation and will be taken seriously and disciplinary actions will be taken. Dismissal of a worker due to a whistleblowing disclosure is grounds for an unfair dismissal claim.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, 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 whistleblower and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the whistleblower informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the whistleblower should be in writing and sent to their home address marked “confidential”.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed e.g. the individual's legal representative.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with CEO if appropriate.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the CEO as appropriate.
- The CEO will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.

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- The whistleblower should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the whistleblower 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 Chief Executive / Business Owner / Chairman, or the designated person described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the whistleblower is not satisfied with the outcome of the investigation, Dove Nest recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body (e.g. the Health and Safety Executive). A full list of prescribed people and bodies can be found on the Government Website (www.gov.uk).

Dove Nest reserves the right to publish the outcomes and actions made as a result of a whistleblowing allegation. This process is intended to reassure any staff the complaint has been resolved and to ensure the issues within the complaint do not occur again. Any report published in this way will be entirely anonymised and whistleblowers will continue to be protected in accordance with this policy.

4. Additional Information

Whistleblowing is a separate procedure to raising a grievance. Employees who make a whistleblowing procedure must be acting in the public interest rather than a personal concern (which would instead constitute a grievance).

For additional information and confidential advice, employees can contact the Advisory, Conciliation and Arbitration service (Acas):

<http://www.acas.org.uk/index.aspx?articleid=1919>