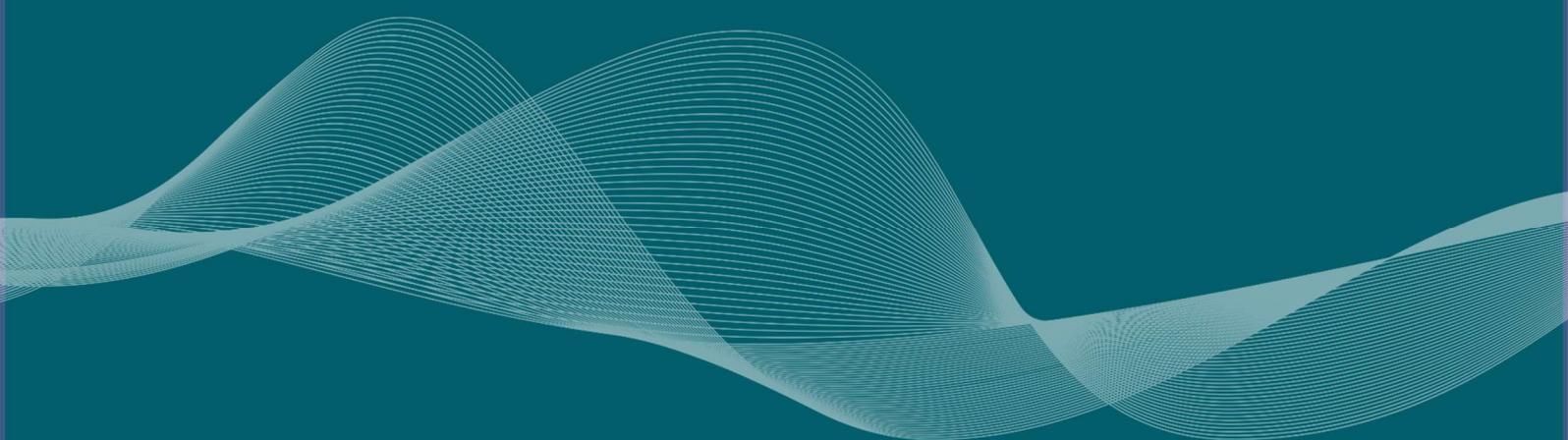




WHISTLEBLOWING POLICY AND PROCEDURES

A decorative graphic consisting of multiple overlapping, wavy lines in a light teal color, creating a sense of motion and depth across the lower half of the page.

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WHISTLEBLOWING POLICY AND PROCEDURES



This policy and procedures document sets out the framework that DMI uses for dealing with allegations of illegal and improper conduct. The policy applies to all DMI staff, directors, consultants and volunteers.

1 Introduction

DMI is committed to the highest standards of transparency, probity, integrity and accountability. It has a number of policies and procedures in place, including the code of conduct and anti-bribery policy, that set the standards of behaviour and conduct expected from anyone representing DMI.

This policy is intended to encourage employees and others to make good faith reports when those standards of behaviour are not upheld, free from the fear of reprisal.

1.1 Responsibilities

The CEO has overall responsibility for the operation of DMI's whistleblowing policy and procedures. The Director of Operations and Finance (DMI UK) will determine the processes to be followed and the format of the records to be kept.

2 Policy purpose

DMI's whistleblowing policy and procedures are intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality. It also intends to protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

The whistleblowing policy and procedures do not replace other relevant DMI policies and procedures. For example, if an employee has a grievance about their working conditions they should use the Grievance procedures. Similarly, if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible, with the CEO or Director of Operations and Finance (DMI UK).

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees or beneficiaries
- Abuse of authority
- Other unethical conduct

3 Definitions

An **allegation** is an oral or written report of suspected misconduct.

The **recipient** is the person at DMI who first receives the allegation. This will usually be the line manager of the whistleblower.

A **whistleblower** is someone who makes an allegation.

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4 Legal framework

The framework in this document is intended to ensure that DMI complies with its duty under the Public Interest Disclosure Act 1998 (England and Wales, Scotland).

5 Making an allegation

DMI recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to DMI and/or to those for whom DMI are providing a service.

DMI will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

5.1 Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower requests otherwise.

However, if the allegation results in court proceedings then the whistleblower may have to give evidence in open court if the case is to be successful.

DMI will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

5.2 Anonymous allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the CEO.

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

5.3 Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation.

However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

6 Procedure for making an allegation

It is preferable for allegations to be made to an employee's immediate line manager, or equivalent if the whistleblower is a director, consultant or volunteer. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that their manager is involved, it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation directly to either of the following:

- The CEO
- The Director of Operations and Finance (DMI UK)

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Or, if the whistleblower feels that both of these alternative channels are inappropriate, as well as their line manager, they can use info@developmentmedia.net (which is monitored by the Project Support team at DMI UK) and the allegation will be considered by another Director level individual at DMI UK.

When an allegation is received, it will be considered by the recipient (who may discuss the allegation with the CEO), discussed with the whistleblower and, after consideration, a decision made on whether the allegation will be investigated.

6.1 Information required in an allegation

Whether a written or oral report is made it is important that relevant information is provided as part of the allegation including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to in order to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

6.2 Action on receipt of an allegation

The recipient will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation:
- The acknowledgement of the allegation;
- Any documents supplied by the whistleblower

The line manager will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Director of Operations and Finance (DMI UK) will be informed within 5 working days of receipt of the allegation. He/she will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the CEO and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children or vulnerable adults then DMI's Safeguarding policy should be referred to.

6.3 Timetable

The whistleblower should receive an acknowledgement of the allegation in writing within 10 working days with the following information:

- An indication of how DMI propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, why not

The recipient of the allegation is responsible for acknowledging it.

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Where the allegation has been made internally and anonymously, obviously DMI will be unable to communicate what action has been taken.

6.4 Support

DMI will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings DMI will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

DMI accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

7 Monitoring

A register of allegations will be kept and will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the CEO and Director of Operations and Finance (DMI UK).

The CEO will report annually to the Board of Directors on any whistleblowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

8 Annex A: Record of updates and amendments

Date	Author	Page(s)	Comments
Aug 18	Doug Harper	All	Initial issue
Jun 20	Meg White	All	Update interval, new branding and minor corrections

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