

# Ahead



MANAGEMENT GROUP

## Whistleblowing Policy

Building fair and effective standards into our business



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## Document Control

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### Document History

	<b>Author</b>	<b>Version</b>	<b>Description</b>
<b>18/02/2022</b>	Donna Chapman	V0.1	Template Draft
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<b>29/07/2022</b>	Donna Chapman		Office Address Change
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### Signatories

<b>Name</b>	<b>Role</b>	<b>Sign off Date</b>
<b>Andy Ewell</b>	AheadMG Delivery Director	22/02/2022
<b>Neil Hickman</b>	AheadMG Finance Director	22/02/2022

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### Document Storage

All versions of the policy will be stored on our website <https://www.aheadmg.com/new-starters/>

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## Whistleblowing Policy

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### Policy Details

All employees, contractors, consultants, officers, casual and agency workers are covered by this policy.

It sets out what you should do if you have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) you or other colleagues.

When you report these kinds of concerns, this is called whistleblowing.

AheadMG are committed to operating at all times, and in everything that we do, to the highest standards of integrity.

However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes.

Please follow the procedure outlined in this policy to immediately report any concerns that you have about this kind of conduct, so that we can take the necessary action to address these concerns as fast as possible.

This policy also covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. If you are concerned about a third party, please also raise them with us before approaching anyone else. Any member of the AheadMG Management Team will be able to explain how you should proceed.

AheadMG will always take your concerns seriously and they will be thoroughly investigated by appropriate personnel. Most importantly, you should feel confident to follow this procedure with confidence. There will be no reprisals for individuals who bring these concerns to our attention – AheadMG value and respect all such reports and those who make them to us. We all play an important role in ensuring that our business and everyone working in and with it acts professionally, lawfully and appropriately.

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### Introduction

AheadMG is committed to the highest standards of openness, probity and accountability.

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 AheadMG resource engaged, employee or associate, that all will faithfully serve AheadMG and its Clients and not disclose confidential information about it or its Clients' affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the 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 (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, gives legal protection to all staff against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. AheadMG has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that 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 taken by AheadMG nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

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### Scope

This policy is designed to enable all staff of AheadMG to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which 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 behaviour
- Attempts to conceal any of these

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## Safeguards

**Protection** - this policy is designed to offer protection to all staff of AheadMG who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). 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.

**Confidentiality** - AheadMG 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 as part of the evidence required.

**Anonymous Allegations** - this 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 AheadMG. In exercising this discretion, the factors to be taken into account will include:

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

**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.

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## Procedure 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 an appropriate member of the AheadMG Management Team unless the complaint is against a member of the Management Team or is in any way related to their actions. In such cases, the complaint should be passed to a Director for referral.
- In the case of a complaint, which is any way connected with but not against a Director, another Director will nominate an independent member of the Management Team or external party to act as the alternative investigating officer.
- Complaints against the Management Team should be passed to the Director who will nominate an appropriate internal / external investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to a Director. The Directors have the right to refer the complaint back to a member of the Management Team if they feel that they can more appropriately investigate the complaint without any conflict of interest.

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

1 \_\_\_\_\_ Donna Chapman \_\_\_\_\_

2 \_\_\_\_\_ Tracy Allen \_\_\_\_\_

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

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## 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 complainant 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 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 marked "confidential".

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## 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 the Directors 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 Management Team or Directors as appropriate.
- The Management Team or Directors involved 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.
- The complainant 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 AheadMG procedures.

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 a member of the Management Team, a 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, AheadMG recognises the lawful rights of all staff and ex-staff 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](http://www.gov.uk)).

AheadMG has a responsibility to ensure that its staff are trained and informed appropriately.

This policy is effectively discharged throughout AheadMG and then reviewed annually, or as necessary, to be compliant with any changing legislation.

This policy applies to all staff and associate groups irrespective of differences in terms and conditions of service, client engagement, seniority levels, working patterns and any other irrelevant distinction.

All policy documents and training must be completed within the first month of engagement for more details please refer to our Mandatory Training Policy.

All AheadMG policies are accessed and stored on our website <https://www.aheadmg.com/new-starters/>