

Introduction

The aim of this policy is to encourage individuals that work for, or on behalf of the company, to raise any genuine concerns regarding wrongdoings within the company, without fear of reprisal. Such concerns include wrongdoings or malpractice where it is reasonably believed that the disclosure is in the public interest.

This procedure should not be used to handle complaints relating to an employee's own circumstances and applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for Vernacare.

This procedure does not give contractual rights to individual employees, workers or contractors. The company reserves the right to alter any of its terms at any time although employees will be notified in writing of any changes.

Types of Wrongdoing

If an individual genuinely believes that the company, or any of those working for, or on behalf of, the Company, has taken, is intending to take, or has failed to take action that they reasonably believe may lead to, or amount to, any of the below:

- a criminal offence;
- a failure to comply with any legal obligations
- bribery
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above

Information can be disclosed verbally or in writing to Human Resources. Full details and any supporting evidence should be provided.

Investigation

The identity of people who raise a genuine concern will be kept confidential wherever reasonably practicable and will be informed of the outcome of investigations.

The company will investigate allegations promptly, calling on the individual who disclosed their concerns for assistance where required.

Employees are discouraged from anonymous disclosures as they are likely to hinder effective investigation and any subsequent resolution.

The company will aim to keep an employee informed of the progress of the investigation and its likely timescales. On occasion there may be a need for complete confidentiality that could prevent investigators from divulging specific details of the investigation or any disciplinary action taken as a result.

Any information divulged about an investigation should be treated as confidential.

While the company cannot always guarantee the outcome an employee may be seeking, we will try to deal with the concerns raised, fairly and in an appropriate way.

If an employee is not happy with the way in which a concern has been handled, this can be raised with the Chief Operating Officer.

We will inform you of the outcome of the investigation as soon as practicable, but will also take whatever action we consider to be appropriate to resolve the concerns raised.

Further Action

If an employee believes that the nature of a concern relates to any of the areas set out above, information should be provided to the appropriate person under this policy in good faith. No action will be taken against you for making a disclosure.

The appropriate action may be taken against any person(s) found to be:

- victimising another person for by using this procedure deterring any person from reporting genuine concerns under this procedure
- making a disclosure/allegation maliciously, vexatiously, in bad faith or with a view to personal gain.

For employees this action may involve the company taking disciplinary action, which may result in dismissal, in line with the company Disciplinary Procedure.

Advice

If you are unsure whether a concern constitutes a wrongdoing then you may in the first instance seek advice from a manager or Human Resources.