



## 'RAISING CONCERNS' POLICY

Date of last review: August 2017

Next Review:

- Changes in NICS guidance; or
- complaint or issue which requires review of policy; or
- August 2019

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## 1. CONCERNED INDIVIDUALS

### 1.1 Foreword

All of us at one time or another may have concerns about what is happening at work. However, when it is about unlawful conduct, a possible fraud or a danger to the public or the environment, or other serious malpractice, it can be difficult to know what to do.

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation.

You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The purpose of these arrangements is to reassure you that it is safe and acceptable to speak up and that any information regarding potential wrongdoing is valued. They are also in place to encourage you to raise your concern at an early stage and enable you to do so in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern and welcome early notification.

If something is troubling you of which you think we should know about or look into, please let us know. The type of concerns to be raised in this way are those about wrongdoing or malpractice in the workplace that have a public interest aspect to them. These are distinct from concerns or disputes about aspects of your employment or how you have been treated - as these are complaints or grievances the organisation's Grievance Procedure should be followed.

If your concern is about possible fraud, you may also wish to refer to our Fraud Prevention Policy and Fraud Response Plan which can be found in the Staff Handbook on the Everyone drive.

***More often than not it is members of staff who first become aware of areas of potential malpractice by an organisation however this policy extends to trainees, agency staff, independent consultants, volunteers, contractors, suppliers, Board members and members of the public. I encourage anyone, internal or external to Northern Ireland Screen, who has a concern of this nature to raise it.***

**Remember, if in doubt, raise it!**

Richard Williams  
Chief Executive (Accounting Officer)

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## 1.2 OUR ASSURANCES TO YOU

In implementing this policy we offer you the following assurances:

***Management's Responsibility/Commitment:*** You, as the concerned individual, are only responsible for raising the concern – it is management's responsibility to ensure any concerns are investigated appropriately and by someone suitably skilled and experienced.

***Your Safety:*** We are committed to making this policy work. If you are an employee of Northern Ireland Screen and you raise a genuine concern under these arrangements, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. If you are not an employee we will do what is in our power to ensure you do not suffer any form of retribution for raising concerns. Of course, this assurance does not extend to someone who maliciously raises a matter they know to be untrue. Northern Ireland Screen will regard such allegations by any employee or Board Member of the Organisation as a serious offence, potentially misconduct which could result in disciplinary action. Similarly we will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will regard any victimisation or mistreatment resulting from raising a concern as a serious offence which could also result in disciplinary action.

***Confidentiality:*** We recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

***Anonymity:*** We appreciate that concerned individuals may be more comfortable raising a concern when their identity remains unknown. This is completely acceptable and anonymity will not determine whether a concern is investigated or not. However remember if you do not tell us who you are, it will be more difficult for us to look into the matter and to give you feedback. Nonetheless, anonymous concerns are preferred to silence about wrongdoing.

### 1.3 HOW DO I TELL IF THIS IS THE POLICY THAT APPLIES TO MY CONCERNS?

Sometimes it is hard to determine whether an issue is:

- a) a concern and dealt with under this policy, or
- b) a grievance and dealt with via the Northern Ireland Screen Grievance Policy.

The table below is to help you make this determination:

Grievances	Concerns
The risk is to yourself	The risk is to others/wider public
There will be a need to prove your case	Can involve a tip off or witness
Involves a rigid process	Pragmatic approach is taken
Legal determination	Focuses on accountability
Individual seeks private/personal redress	Redress is in the public interest

Furthermore, sometimes an issue is triggered by a customer being dissatisfied with an aspect of a service provided by Northern Ireland Screen e.g. Northern Ireland Screen failing to deliver a service within an agreed timescale or to a suitable standard/quality. This is a complaint and should be dealt with via Northern Ireland Screen's complaints policy.

#### LINKS:

The Northern Ireland Screen grievance policy can be found in the Staff Handbook on the 'Everyone' drive.

The Northern Ireland Screen complaints procedure can be found at <http://www.northernirelandscreen.co.uk/sections/58/review-and-complaints-procedure.aspx>

## 1.4 WHO DO I TELL?

Please remember that you do not need to have firm evidence to support your concern prior to raising it, however we do ask that you explain, as fully as you can, the circumstances that gave rise to your concern.

If you wish to raise a concern you can do so orally or in writing to any of the following:

1. **Your line manager or their line manager**
2. **Chief Executive, Director of Finance & Corporate Services, Chair of Audit & Risk Committee or Head of Internal Audit**

Chief Executive – Richard Williams	Tel: 02890 232444 or Email: <a href="mailto:richard@northernirelandscreen.co.uk">richard@northernirelandscreen.co.uk</a>
Director of Finance & Corporate Services – Linda Martin	Tel: 02890 232444 or Email: <a href="mailto:Linda@northernirelandscreen.co.uk">Linda@northernirelandscreen.co.uk</a>
Chair of Audit & Risk Committee – Fiona MacMillan	Email: <a href="mailto:f.macmillan@ntlworld.com">f.macmillan@ntlworld.com</a>
Head of Internal Audit PWC – Cara McCrory	Tel: 02890 245454 or Email: <a href="mailto:cara.l.mccrory@uk.pwc.com">cara.l.mccrory@uk.pwc.com</a>

3. **Chair of the Board** – should you feel the level of risk presented by the concern warrants senior attention in the first instance you can contact the Chair of Northern Ireland Screen.

Chair of the Board – Rotha Johnston	Email: <a href="mailto:rotha@wildflowerproperty.com">rotha@wildflowerproperty.com</a>
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4. **Independent Body** - While we hope we have given you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you consider it more appropriate to report a concern to an independent body, for example the Northern Ireland Audit Office (NIAO) or the Health & Safety Executive for Northern Ireland (HSENI). If you are in any doubt we would rather you take this course of action than not raising your concern at all.

It is important to note that for the purposes of protection under the Public Interest Disclosure (NI) Order 1998, both these bodies are considered 'Prescribed Persons' and therefore any disclosure made to them will be protected. See full list of independent bodies that are deemed 'prescribed persons' and their contact details at [www.delni.gov.uk/public-interest-disclosure-guidance](http://www.delni.gov.uk/public-interest-disclosure-guidance).

Remember, if you wish to raise the matter in confidence and keep your identity unknown as far as possible, please say so at the outset to allow the appropriate course to be taken.

### 1.5 HOW WILL MY CONCERN BE HANDLED?

- Be assured that all concerns raised will be taken seriously and will be appropriately investigated.
- Access to concerns, related information and related documentation will be limited to only select staff.
- On receiving a concern an initial assessment will be done to determine what action should be taken.
- This may involve an informal review, an internal inquiry or a more formal investigation.
- Where it is decided that a formal investigation is necessary the overall responsibility for the investigation will lie with a nominated "investigation officer."
- In any event if the concern has not been raised anonymously, within 10 working days of Northern Ireland Screen receiving the concern, we will tell you who is dealing with the matter, how you can contact him or her, and whether your further assistance may be needed. If you request, we will write to you summarising your concern and setting out how we propose to handle it.
- When you raise the concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure we will tell you.

- We will give you as much feedback as we properly can, and if requested, we will confirm it in writing. However, we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.
- We aim to provide this feedback within 20 working days however this will ultimately depend on the nature of the concern and we will follow up with further feedback if deemed appropriate.

### 1.6 WHERE CAN I GET INDEPENDENT ADVICE?

If you are unsure whether or how to raise a concern or you want confidential advice at any stage, you may contact your Trade Union. You may also contact the independent charity Public Concern at Work (PWAC) on 020 7404 6609 or by email at [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). Their lawyers can talk you through your options and help you raise any concern. For more information, you can visit their website at [www.pcaw.co.uk](http://www.pcaw.co.uk).

### 1.7 CONCLUSION

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using these arrangements you will help us to achieve this.

Please note, this document has been developed to meet best practice and comply with the Public Interest Disclosure (NI) Order 1998 (PIDO) which acts to protect individuals who make certain disclosures of information in the public interest. For more information on the law, see the Public Concern at Work website ([www.pcaw.co.uk](http://www.pcaw.co.uk)) or a short guide to PIDO at [www.delni.gov.uk/public-interest-disclosure-guidance](http://www.delni.gov.uk/public-interest-disclosure-guidance).



## 2. EMPLOYEES IN RECEIPT OF CONCERNS

Concerns can be in relation to Northern Ireland Screen or its Arm's Length Bodies.

Although initial contact might be brief, when dealing with a concerned individual you should have a positive and supportive attitude.

If contact is made over the phone you should:

- Explain that their concern will be passed to Human Resources who centrally deal with concerns and ask if they would be content for Human Resources to contact them to discuss their concerns. If they are not content to be contacted ask them to put their concerns into writing and forward to:

Director of Finance & Corporate Services  
Northern Ireland Screen  
3<sup>rd</sup> Floor, Alfred House  
21 Alfred Street  
Belfast  
BT2 8ED

- Inform Human Resources immediately that contact has been made to allow Human Resources to contact the individual or await correspondence

If contact is made via email or letter you should:

- Forward to the Director of Finance & Corporate Services immediately who will determine the most appropriate first steps; this is to ensure that appropriate procedures are followed and access is limited as far as possible in order to preserve confidentiality and protect both the party raising the concern and any parties named in the concern.

Note: Depending on the nature of the concern it may be handled under the Organisation's Fraud Response Plan. It is important to recognise that allegations/concerns may point to fraud, even if the word "fraud" is not used. The nature of the concerns will be considered by the Director of Finance & Corporate Services and if appropriate the Fraud Response Plan will be initiated.