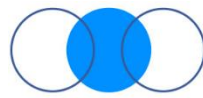


Code	WB.001
Title	Whistleblowing Policy
Status	Active
Prepared by	Stuart Hanson
Approved by	Dorian R Ramirez Sosa
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Date of next review	20.11.2026
Contact Officer	Stuart Hanson
Distribution Status	Controlled



What is Whistleblowing?

Whistleblowing encourages and enables employees/interns/trainees/contractors/non-executive directors to raise serious concerns **within** Direct Mediation Services rather than overlooking a problem or 'blowing the whistle' outside.

Employees/interns/trainees/contractors/non-executive directors are often the first to realise that there is something seriously wrong with Direct Mediation Services. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to Direct Mediation Services.

Our Commitment

Direct Mediation Services is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees/interns/trainees/contractors/non-executive directors, and others that we deal with, who have serious concerns about any aspect of Direct Mediation Services' work to come forward and voice those concerns.

Who does the Policy apply to?

The policy applies to all employees, (including those designated as casual hours, temporary, agency, authorised interns, trainees, contractors, non-executive directors), and those contractors working for Direct Mediation Services or on Direct Mediation Services premises. It also covers suppliers and those providing services under a contract with Direct Mediation Services in their own premises.

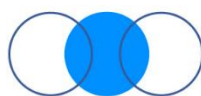
The Aims of the Policy

- To encourage you to feel confident in raising concerns and to question and act upon concerns about practice.
- To provide avenues for you to raise concerns in confidence and receive feedback on any action taken.
- To ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- To reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made a disclosure in good faith.

What Types of Concern are Covered?

- Conduct which is an offence or a breach of law.
- Failure to comply with a legal obligation.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of public funds.
- Possible fraud and corruption.
- Sexual, physical or other abuse of clients.

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- Other unethical conduct.
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is rights and wrong.

NB. Other procedures are available to employees e.g., the Grievance procedure which relates to complaints about your own employment. This policy also does not replace our complaints procedure, which is for public use.

Safeguards and Victimisation

Direct Mediation Services recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you provide a service.

Direct Mediation Services will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

This policy encourages you however to put your name to your concern whenever possible. Please note that:

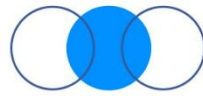
- Employees/interns/trainees/contractors/non-executive directors must disclose the information in good faith.
- Employees/interns/trainees/contractors/non-executive directors must believe it to be substantially true.
- Employees/interns/trainees/contractors/non-executive directors must **not** act maliciously or make false allegations.
- Employees/interns/trainees/contractors/non-executive directors must **not** seek any personal gain.

How to Raise a Concern

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the board of non-executive directors.

Direct Mediation Services' financial regulations require that the Finance Manager shall be notified of all financial or accounting irregularities or suspected irregularities. This policy

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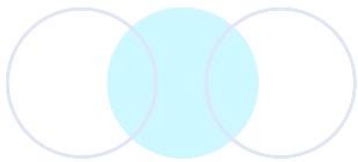
does not supersede that requirement, it does in fact provide the opportunity to raise concerns directly.

To make a confidential call please ring the dedicated Whistleblowing number:
07748966211

Concerns can also be made in writing. Correspondence should be sent to:

Dr. Maria Moscati (Non-Executive Director), Direct Mediation Services, Vicarage Chambers, 9 Park Square East, Leeds, LS1 2LH.

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