

1 Scope

- 1.1 This policy applies where a colleague or member of the public reasonably believes that at least one of the following sets of circumstances apply within the Group;
- a criminal offence has been committed, is being committed or is likely to be committed;
 - a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
 - a miscarriage of justice has occurred, is occurring or is likely to occur;
 - financial impropriety has occurred, is occurring or is likely to occur;
 - the health and safety of any individual has been, is being or is likely to be endangered;
 - the environment has been, is being or is likely to be damaged;
 - abuse of company property has occurred, is occurring or is likely to occur;
 - information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.
- 1.2 It is intended for people to raise concerns that are in the public interest, where the interests of others or of the organisation itself are at risk due to one of the above circumstances. It is different from the grievance procedure whereby colleagues of the Aster Group may already raise complaints or matters of genuine concern relating to their own employment and is different from the complaints process that relates a customer's experience of service delivery.
- Colleagues may also use the speak up process to raise concerns if they witness or experience inappropriate and unacceptable behaviour, for example sexual discrimination, racism or other types of discrimination. The principles of this policy will apply to any investigation into concerns of this nature, however it is important to distinguish between qualifying disclosures under the Public Interest Disclosures Act (listed in 1.1) and speak up concerns that are not qualifying disclosures, as statutory protection applies only to qualifying disclosures. The Speak Up Procedure provides further guidance on statutory protection.

2 Policy Statement

- 2.1 The Aster Way sets out our values and behaviours, maintaining the highest standards of honesty, openness and accountability. Aster Group takes all malpractice very seriously, whether it is committed by non-executive directors, senior leaders, colleagues, suppliers or contractors.
- 2.2 The Group recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Group's success ensured. This policy is intended to promote an open, honest and accountable culture and is a crucial element of the Aster Group's corporate governance and risk management frameworks.
- 2.3 It is not necessary for the person reporting a concern to prove the breach or failure that they are alleging has occurred or is likely to occur, they may simply raise a reasonable suspicion and be doing so genuinely and without vexatious intent.

- 2.4 Persons making a report in good faith through this policy are assured that they will not suffer detriment to their relationship with the Group as a result, for example their employment within the Group, tenancy or contract. This assurance applies to both qualifying and non-qualifying disclosures.
- 2.5 The Group will treat all information received as confidential but recognises it may not always be possible for it to remain anonymous during the investigation process. It must be appreciated that it will be easier to follow up and to verify reports if the reporter is prepared to give his/her name, and unsupported anonymous reports and allegations are much less powerful and therefore will have to be treated with caution. Persons seeking to make an anonymous report will be encouraged to provide their reason for wishing to remain anonymous, to enable the recipient of the disclosure to provide support and assurance. There will be circumstances where information must be disclosed for legal reasons, or to enable legal steps to be taken, e.g. if the circumstances amount to a serious crime there may be circumstances where information will have to be passed to senior officers or to external agencies such as the police or external auditors.

Roles and Responsibilities

- 2.6 The Group will ensure that there are appropriate channels communicated on its website for a member of the public to raise a concern.
- 2.7 When a colleague wishes to speak up, it is envisaged that their Leader will be the first point of contact in most cases. It is, however recognised that there may be times when a colleague feels unable to do this, for example when they suspect that their Leader may be involved in the malpractice or has failed to take appropriate action when the matter has been raised previously.
- 2.8 The Governance & Risk Director (or in the absence of, the Risk & Compliance Lead) has the following remit:
- to receive and record any reports made under this Policy
 - where there is a concern of fraud, refer the case to the Director of Audit for investigation.
 - to ensure the confidentiality of any reporter who requests that their report be treated in confidence subject to paragraph 2.5 above.
 - to investigate promptly any report and to respond directly to the reporter, with a right of access to the Group Chief Executive Officer and all colleagues of the Aster Group and as provisioned by the Delegations Matrix - to all documents and records of the Group.
 - to report to the appropriate Lead Director where the investigation identifies a serious cause for concern within the responsibilities of that Lead Director and to recommend the use of any relevant statutory powers or duties. Where the report relates to the conduct of a member or one of the Lead Directors, he/she should report to the Chief Executive Officer. Where the report relates to the Group Chief Executive Officer, he/she should report to the Senior Independent Director or the Group Chair.
 - to report either jointly with the Lead Director(s) concerned or in his/her own right, as directed under D119 of the Delegations Matrix.
 - to recommend, in conjunction with the Chief Executive Officer to settle appropriate action to resolve a report, and
 - to report to the Group Audit Committee on the number and nature of concerns raised under this policy.

3 Monitoring and Review

- 3.1 The number, nature and origin of reports will be monitored by the Group Audit Committee.
- 3.2 Awareness of this policy and the confidence of colleagues to raise concerns will be monitored by the Risk & Compliance Lead through engagement with colleagues.
- 3.3 The effectiveness of this policy will be scrutinised after 12 months by *Corporate Performance & People Panel*
- 3.4 This policy will be reviewed every 3 years unless there is a change in legislation or regulation.

4 Related Policies and Procedures

- 4.1 Speak Up Procedure.

Honesty Policy
Gifts, Hospitality and Anti-Bribery Policy
Health & Safety Policy
Financial Control Policy

5 Governance

Effective From:	29/10/2020	Expires:	28/10/2023
Policy Owner:	Governance & Risk Director		
Policy Author:	Head of Risk & Compliance		
Approved by:	<i>Group Audit Committee</i>		
Delegation Matrix Reference:	R030	Version Number:	7.1