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Speak Up Procedure – reporting concerns

	**Step 1** – Identify who to speak to based on your concern	If you are worried that something wrong or dangerous is happening at work, please report it. We hope you will feel able to tell your line manager or another local manager. They may be able to resolve your concern quickly and effectively. Guidance for managers dealing with concerns is available here. If you do not feel able to tell a local manager, or the manager's response does not seem right, the flowchart at Appendix 1 will help you identify the best person to contact. Contractors, consultants, agency workers or any other third parties should raise any concerns with their DWF specific point of contact (SPOC) or, alternatively, can use this Speak-Up procedure.
	**Step 2** - Speak Up	The Speak-Up procedure is for concerns relating to suspected wrongdoing, or potential risks that have a wider impact (e.g. to the general public, clients, colleagues or DWF itself). Appendix 2 contains some examples of the types of behaviours that should be reported through the Speak Up procedure, and in contrast, concerns that should be reported to a specific team or raised under another policy. For example, a client complaint would fall under the Client Complaints Policy, and any personal work-related issues should be raised with your manager or HR first. If you have been through these channels and still have concerns, or you feel the matter is so serious that you cannot discuss it with anyone, please report it via our Speak Up Portal or you can email speakup@dwf.law. Through the portal you can access confidential advice and support, raise a concern (anonymously if you wish), and check the status of any report you make through the portal. It is available 24 hours a day, seven days a week in all languages. External, independent and trained handlers manage the portal.

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	**Step 3** – How to raise your concern	You can either tell someone about your concern or put it in writing.
		Raise it as soon as possible.
		We will not ask you to prove your concern, but it will help us if you can explain the circumstances that give rise to your concern, and give us any supporting information. Ask yourself:
		• What are you concerned about and why?
		• What has happened that has given rise to your concern(s)?
		• If there has been a series of events, or the behaviour you are concerned about has happened more than once, set out a chronological timeline.
		  • Who is or was involved?
		  • Who has been or might be impacted and how?
		  • If you have already raised your concern with someone, what did you report, to whom and when? What, if anything, happened as a result?
		Remember:
		  • Try to remain objective. Provide any evidence you can when you report your concern, but do not investigate the matter yourself.
		  • Explain what you have observed, or what you've heard from others.
		  • Keep it in perspective – there may be an innocent explanation;
		  • Keep it confidential so not to impact any investigation; and
		  • Stay calm – you are doing the right thing.
		• If you are worried that you may implicate yourself by raising your concern, please know that your active cooperation in any investigation will be taken into account as part of the outcome, depending upon the scale and seriousness of the issues raised. The Company will reasonably keep confidentiality to the extent possible if it does not interfere with the necessary investigation.

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	**Step 4** –Confidentiality, anonymity and support	We hope colleagues feel able to raise concerns openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially or remain anonymous. All concerns will be treated sensitively and confidentially (as far as possible). If you ask us not to reveal your identity, we will not do so without your consent, unless required e.g. under a legal duty to a law enforcement agency/regulatory authority, and to the extent that it does not interfere with the necessary investigation. Your concern will still be investigated. There may be times however when we might not be able to investigate or resolve a concern without revealing your identity, for example, where your personal evidence is essential. If that is the case, we will discuss with you whether and how the matter can proceed. If you are prepared to disclose your identity, we can: • contact you for further details if necessary, so that we can investigate thoroughly; • keep you updated as the investigation progresses; better protect you from being treated unfavourably because you have spoken up and done the right thing. You can ask a colleague or HR specialist to support you under this procedure, as long as that person is not involved in the issue that you are reporting. As a reminder, further information and resources to support your wellbeing can be found on the Wellbeing Hub on Rubix including contact details for DWF's Employee Assistance Provider for your location, which will give you access to confidential support and counselling services 24 hours a day, 7 days a week.

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	**Step 5** - Investigation	We welcome the opportunity to look into concerns and will: • take the matter seriously; • make appropriate arrangements for an independent investigation; and • aim to investigate promptly in a way that is fair to everyone involved. • assess it and consider what action might be appropriate. This may involve: - referring the matter to a specialist team such as HR, Data Protection, Client Care, Business Support; - an informal review; or - an internal inquiry or a more formal investigation. Provided we have a means of contacting you, we will acknowledge receipt of your concern within 5 working days and tell you who will be handling the matter and how you can contact them. If you raise a concern via the Speak Up Portal or the speakup@dwf.law email address, Group General Counsel will assess the information provided, and liaise with the most appropriate people in the business to manage the investigation and determine the outcome. We will aim to conclude the investigation within 10 to 20 business days, depending on the scope and extent of the investigation.
	**Step 6** – Outcome	If you told us your identity, we will give you feedback on the outcome of any investigation. We may not be able to tell you about the precise findings or actions we take that are commercially sensitive or confidential. We will communicate the findings and any recommendations or remedial action confidentially to the Executive Board and any other senior personnel on a 'need to know' basis. If you are concerned that the investigation was not conducted properly or the wrong outcome was reached, you should report your concern via the Speak Up portal or the speakup@dwf.law email address. If you feel that your concern was not handled appropriately via the Speak Up portal or email, you should contact the Chief Risk Officer.

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		Whilst DWF encourages use of our internal reporting mechanisms for concerns about wrongdoing, malpractice or illegal acts or omissions, we recognise and respect the rights of colleagues to report concerns externally with certain prescribed bodies in their local jurisdiction (such as regulators, the Equal Employment Opportunity Commission and/or your local human rights commission). Further information and advice can be found at: • Protect (formerly Public Concern at Work) website: Advice Line | Protect - Speak up stop harm (protect-advice.org.uk) • Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk) www.eeoc.gov
	**Step 7** - Our stance on retaliation	If you seek advice, speak up to raise a concern or report misconduct, you are doing the right thing. Provided you are raising a genuine concern, it does not matter if that later turns out to be mistaken. We do not tolerate retaliation against anyone who speaks up about a genuine concern. Retaliation could include for example being excluded, disciplined, threatened, harassed or subjected to any other unfavourable treatment because you have raised concerns. If you believe that you have suffered any such treatment, you should inform the investigating manager immediately. If the matter is not remedied you should raise it formally using your local Grievance/Workplace Environment Policy & Procedure
	**Step 8** – Governance and reporting	Every year: • the Speak Up policy and procedure will be reviewed to ensure they are appropriate and effective. • Information will be collated about the number and types of disclosures reported, the outcomes of investigations, and any feedback provided on the use of the Speak Up portal. • this information will be reported to the Audit Committee. Confidentiality will be maintained.

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Appendix 1 – Speak Up Process Flow

Please click here to view the Speaker Process Flow

Appendix 2 - Examples of Behaviours

- Walking through Finance, you notice a credit controller writing down credit card details on a notepad that contains other credit card information.
  - Speak to your manager, as credit card details should not be recorded. Retaining them might be in breach of the law or an indication that someone is thinking about doing something unlawful.
  - If you'd prefer, you could speak to a more senior manager or your HR Business Partner.
  - Alternatively, you could make a report via the Speak Up Portal or email address.

- You did not get a 'generous' pay rise this month, which your manager suggested you would.
  - Raise this with your manager's manager or a HR Business Partner.
  - This is an individual concern relating to a person's remuneration, it is not an issue covered by the Speak Up Policy. If the matter is not resolved informally, the individual could choose to pursue a grievance under the Grievance policy & procedure.

- During a tender process, you overheard some suspicious phone calls between a colleague and third party discussing money. Now the contract has been finalised, your colleague comments about finally affording an expensive holiday and a new car. The timing makes you feel uncomfortable.
  - Speak to your manager. It might be a coincidence, but if your colleague has accepted any payments during the tendering process, this might be in breach of antibribery and corruption laws.
  - If you'd prefer, you could speak to a more senior manager or your HR Business Partner.

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- Alternatively, you could make a report via the Speak Up Portal or email address.

- A client complains to you about their latest bill.
- Use the Client Complaints Policy and procedure. This is not an issue covered by the Speak Up Policy.

- You observe your manager behaving inappropriately towards a colleague.
  - If you're comfortable in doing so, speak to them directly or to the next level manager. If you'd prefer, you can speak to your HR Business Partner.
  - Alternatively, you could make a report via the Speak Up portal or email address.

- Electrical cables have been laid across the main office walkway. You think this could be a trip hazard, and there are no warning signs or safety measures. You've mentioned this to Facilities, but nothing has been done.
  - Raise this concern with your manager, another local manager or the Office Manager, or if you'd prefer, any local HR contact or your HR Business Partner.
  - Whilst this could be a danger to health and safety and you could make a report via the Speak Up portal or email address, that would not be the quickest or most effective way to deal with this issue. The issue is likely to have arisen due to an oversight or lack of attention rather than any malpractice and, as it is specific to the location, it will be best reported and handled locally.

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