

dance



life



# WHISTLE BLOWING POLICY

Owner: Integrity Officer  
Version date: 17 February 2020



**Dance4Life seeks to attain the highest possible levels of management and accountability. The organization has a strict policy towards for example any form of corruption or fraud.**

**This is why Dance4Life has adopted a range of proactive measures to prevent and deter acts of corruption or fraud among its staff and staff of implementing partners, beneficiaries, and service providers.**

All staff are required to observe the highest standards of business and personal ethics when performing their duties and responsibilities. They are expected to be honest and maintain integrity in fulfilling their

responsibilities and comply in full with all applicable laws and regulations.

This whistleblowing procedure is an important element for detecting dangerous, immoral or illegal practices and is consequently considered an essential component for achieving good corporate governance.

As part of our good governance practices, Dance4Life undertakes to protect individuals who wish to report or protest the occurrence of irregularities and malpractices that undermine the objectives of the organization. Dance4Life employees are explicitly asked to report any suspected violations. Unless such is not deemed possible or advisable, complaints should first be submitted in writing to their immediate superior before employing the whistleblowing procedure. The staff of implementing partners, beneficiaries, and service providers are encouraged to report violations or suspected violations initially to their regular contact person at Dance4Life, before using the whistleblowing procedure to report the matter (unless they believe this will endanger them or undermine their claim).

The superior or regular contact person ensures that the Executive Director is immediately notified of the reported suspected misuse. If the Executive Director is the subject of the report, the superior or regular contact person can submit his/her report to the Supervisory Board.

All reports received regarding irregularities at partner organizations funded by Dance4Life or at service providers will be handled in accordance with the provisions of the Dance4Life sanctions procedure, where applicable.

## 4.1. WHAT IS WHISTLEBLOWING?

Under this procedure, 'whistleblowing' is defined as Dance4Life stakeholders and the staff of implementing partners, beneficiaries, and service providers reporting dangerous, immoral, or illegal practices which take place under the responsibility of Dance4Life. Dance4Life understands that preventing such practices is in the public interest. Therefore the aim of this procedure is to encourage employees and others who have serious concerns about any aspect of Dance4Life work to come forward and voice those concerns.

Employees are often the first to realize that there may be something seriously wrong within the organization. Whistleblowing is viewed by Dance4Life as a positive act that can make a valuable contribution to Dance4Life efficiency and long-term success. Dance4Life is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in everything the organization does. To help achieve these standards it encourages freedom of speech.

If you are considering raising any concerns, please read this procedure first. It explains:

- / the type of issues that can be raised;
- / how the person raising a concern will be protected from victimization and harassment;
- / how to raise a concern;
- / what Dance4Life will do to follow up on a complaint.

If you are unsure whether to use this procedure or want independent advice at any stage, you may contact the confidential advisor ([l.tat@arbobutler.nl](mailto:l.tat@arbobutler.nl)) or write directly to our whistle blower partner, SeeHearSpeakUp.

<https://www.seehearspeakup.co.uk/nl/file-a-report>

## 4.2. WHAT IS THE AIM OF THE WHISTLEBLOWING PROCEDURE AND WHEN DOES IT APPLY?

### 4.2.1. Aims of the procedure

The procedure is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Dance4Life without fear of victimization, subsequent discrimination, disadvantageous treatment, or dismissal.

It is also intended to encourage and enable you to raise serious concerns within Dance4Life rather than ignoring a problem or 'blowing the whistle' concerning such issues to external parties.

This procedure aims to:

- / Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practices;
- / Provide a safe channel for you to raise those concerns and receive feedback on any action taken;
- / Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- / Reassure you that you will be protected from possible reprisals or victimization if you have made any disclosures in good faith.

### 4.2.2. Scope of this procedure

- / This procedure is intended to enable those who become aware of any wrongdoing at Dance4Life that impacts on another person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.
- / The Whistleblowing Procedure is not intended to replace existing procedures:
- / If an individual's concern relates their personal treatment as an employee, it should be raised it under the existing complaints procedure (see above)
- / If any person has a concern about services provided to him/her, it should be submitted as a complaint to Dance4Life

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### 4.2.3. Who can raise concerns under this procedure?

The procedure applies to all:

- / Employees of Dance4Life;
- / Employees of contractors working for Dance4Life, such as consultants;
- / Employees of suppliers;
- / Those providing services under a contract or other agreement with Dance4Life in their own premises.

### 4.2.4. What should be reported?

Any serious concerns that you have about service provision or the conduct of officers or members of Dance4Life or others acting on behalf of Dance4Life that:

- / Make you feel uncomfortable in terms of established standards;
- / Fall below established standards of practice;
- / Are improper behaviour.

These might relate to:

- / Conduct which is an offence or a breach of the law (a criminal offence has been committed or a party fails to comply with any other legal obligation);
- / Disclosures related to miscarriages of justice;
- / Racial, sexual, disability or any other form of discrimination;
- / Health and safety of the public and/or other employees;
- / Environmental degradation;
- / Unauthorized use of public funds or other assets;
- / Possible fraud and corruption;
- / Neglect or abuse of clients;
- / Other unethical conduct

This list is not exhaustive.

## 4.3. PROTECTING THE WHISTLEBLOWER WITHIN DANCE4LIFE

### 4.3.1. Your legal rights as a Dance4Life Employee

This procedure has been written with due regard for The Whistleblowers Authority Act of 1 July 2016 (the Act), which protects employees of Dance4Life making disclosures about specific matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for Dance4Life to dismiss anyone or allow them to be victimized because they have made an appropriate lawful disclosure in accordance with the Act.

On rare occasions, a case might arise in which the employee reporting has also participated in the action causing concern. In such a case it is in the

employee's interest to come clean as soon as possible. Dance4Life may still take disciplinary action against the offending employee, however their coming forward will be taken into account before any final decision is made.

### 4.3.2. Harassment or victimization

Dance4Life is committed to good practices, high standards and to being supportive of you as an employee or an individual associated with Dance4Life in any other manner.

Dance4Life recognizes that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe that what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues, and those for whom you are providing a service.

Dance4Life will not tolerate any harassment or victimization of a whistleblower (including informal pressure) and will take appropriate action to protect you against any disadvantage when you raise a concern in good faith and will treat such harassment as a serious disciplinary offence that will be dealt with under the disciplinary rules and procedure.

### 4.3.3. Support for the whistleblower

Throughout this process:

- / You will be given full support from senior management (in case the matter is related to the Executive Director, the support will be provided by the supervisory board);
- / Your concerns will be taken seriously;
- / Dance4Life will do all it can to assist you throughout the investigation.

For those who are not Dance4Life employees, Dance4Life will endeavor to provide appropriate advice and support wherever possible.

### 4.3.4. Confidentiality

All concerns will be dealt with confidentially and every effort will be made to not reveal your identity, should you wish it to remain confidential. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your assistance, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

### 4.3.5. Anonymous allegations

This procedure encourages you to put your name to your allegations whenever possible. If you do not tell us who you are it will be much more difficult for us to protect you or to give you feedback. This procedure is not suited to concerns raised anonymously. Concerns expressed anonymously are much less effective, but they may still be reviewed, at the discretion of Dance4Life.

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In exercising this discretion, the factors to be taken into account include:

- / the seriousness of the issue raised;
- / the credibility of the concern;
- / the likelihood of confirming the allegation from other sources.

For the formal reporting of suspected irregularities, Dance4Life makes use of the email address: [integrity@dance4life.com](mailto:integrity@dance4life.com). This email address is accessible for the Integrity Officer of Dance4Life (Steven Hendriks). Incoming reports of suspected irregularities are treated identically to integrity complaints as explained under article 3.4, 3.5 and 3.10.

### 4.3.6. False allegations

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, Dance4Life will recognize your concern and there will be no further consequences for you. If, however, you make an allegation frivolously, maliciously, or for personal gain, appropriate action, including disciplinary action, may be taken.

## 5. WHISTLEBLOWING PROCEDURE

### 5.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Under normal conditions, you can raise your concerns with:

- / Your line manager;
- / A Management Team member;
- / Your contact person within Dance4Life;
- / Or via the external whistleblower email address listed above

If, under exceptional circumstances, your concern relates to the Executive Director of Dance4Life, then it should be raised with the Supervisory Board, which will decide on how the investigation will proceed. This may include an external investigation.

If you are unsure who to contact, you may contact the [confidential advisor](#) at: Laura Tat: [L.tat@arbobotler.nl](mailto:L.tat@arbobotler.nl)

### 5.2. How to raise a concern

You may raise your concern by telephone, in person, or in writing. The sooner you raise your concern, the easier it is to take action. You will need to provide the following information:

- / the nature of your concern and why you believe it to be true;
- / the background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt that your suspicion is true, you will need to demonstrate to the person you contact that you

have a genuine concern relating to suspected wrongdoing or malpractice within Dance4Life and that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first. You may find it easier to raise the matter if there are two or more of you who have had the same experience or concerns.

You may invite your trade union, professional association representative, or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

### 5.3. What Dance4Life will do

Dance4Life will respond to your concerns as quickly as possible. Remember that the investigation of your concerns is not the same as either accepting or rejecting them.

The overriding principle for Dance4Life will be that of the public interest. In order to be fair to all employees, including those who may be wrongly or erroneously accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until, or indeed if, it becomes necessary to do so. In certain cases, however, such as allegations of ill-treatment of others, immediate suspension from work may have to be considered. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- / Be investigated by management, an internal auditor, or through the disciplinary/grievance process;
- / Be referred to the police;
- / Be referred to the external auditor;
- / Be referred to and subjected to established child protection/abuse procedures;
- / Form the subject of an independent inquiry.

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- / Acknowledging that the concern has been received;
- / Indicating how Dance4Life proposes to deal with the matter;
- / Supplying you with information on staff support mechanisms;
- / Telling you whether further investigation will take place and if not, why not.

The level of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and

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the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you to provide support.

Dance4Life will do what it can to minimize any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, Dance4Life will arrange for you to receive appropriate advice and support.

It is our task to assure you that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

### **5.4. The Responsible Officer**

Integrity Officer has overall responsibility for the maintenance and execution of this procedure.

### **5.6. How the matter can be taken further**

This procedure is intended to provide you with a way to raise concerns within Dance4Life. Dance4Life hopes you will be satisfied with any action taken. If you are not satisfied, and you feel it is appropriate, you can take the matter to parties outside of Dance4Life.

***This procedure does not prevent you from seeking legal advice yourself.***

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Dance4Life empowers and educates young people. We provide them with the knowledge, skills and confidence they need to protect their health and promote safe sexual choices