

whistleblowing policy

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1. Policy statement

- 1.1 believe housing is committed to conducting its business with openness, honesty and integrity and we expect all staff to maintain high standards in accordance with our Code of Conduct.

2. Policy aims

- 2.1 The aim of this policy is to encourage you to assist us in tackling wrongdoing within the organisation and in setting standards of ethical conduct. These are very serious issues, and we are committed to tackling any malpractice within the organisation at all levels.
- 2.2 All staff and customers or other stakeholders are encouraged to speak up if you have any concerns.
- 2.3 The purpose of this policy is to:
- encourage everyone to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
 - provide individuals with guidance as to how to raise those concerns
 - reassure everyone that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 2.4 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time at the organisation's discretion.

3. Who does this policy apply to?

- 3.1 This policy applies to all employees, Board and Customer Voices members and involved residents, as well as other individuals, such as customers, consultants, contractors, suppliers, casual workers, agency workers, volunteers and interns.

4. What is whistleblowing?

- 4.1 'Whistleblowing' is the disclosure of information that relates to suspected wrongdoing or dangers at work. This may include:
- bribery
 - financial fraud or mismanagement
 - conduct likely to damage believe housing's reputation or financial wellbeing
 - neglect or abuse of vulnerable customers, clients or colleagues
 - any other unethical conduct or behaviour.
- 4.2 A 'whistleblower' is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **concern**) you should report it under this policy.

5. How to raise a concern

- 5.1 If you are aware of or suspect that there may be any sort of wrongdoing occurring within believe housing, we strongly encourage you to let the relevant person know about it.

By employees

- 5.2 In most cases, it should be possible for you to raise any concerns you have with your line manager. If this is not possible, depending on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice, you should speak to one of the following:

- another senior manager, director or member of the Executive Management Team
- Company Secretary
- Board Chair or Chair of Audit Committee
- our internal auditors.

By Board, Customer Voices and involved residents

- 5.3 The reporting procedure is as follows:

- if you have concerns about an employee, report to a member of the Executive Management Team
- if you have concerns about a member of the Executive Management Team, Senior Leadership Team or another member of the Board, report to the Chair of the Board
- if you have concerns about the Chair of the Board, report to the Chair of Audit Committee.

Reporting by the public

- 5.4 Where members of the public wish to report alleged irregularities or concerns then they should make contact in one of the following ways:

- Contacting a member of staff in our Customer Hub
- Contacting our Chief Executive
- Contacting the Executive Director of Finance and Investment
- Contacting the Executive Director of Governance and Strategy/Company Secretary
- Contacting the Chair of the Board
- Contacting the Regulator of Social Housing
- Contacting the police.

- 5.5 Members of the public are encouraged to put their allegations in writing and put their name to the allegations as this enables any investigation to be carried out in a prompt and proper manner. Confidentiality will be maintained wherever possible.

External 'Speak Up' service

- 5.6 Support is also available through an independent and free confidential telephone counselling service provided by DAS (Zurich Municipal) on behalf of believe housing on **0117 934 2121** for emotional support at any time, 24 hours a day. This service is operated separate to believe housing and therefore any concerns will still need to be raised in accordance with this policy.
- 5.7 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.
- 5.8 Protect can be contacted on - Helpline: 020 3117 2520 or using the form on their website: <https://protect-advice.org.uk/contact-protect-advice-line/> Protect will aim to get back to you within three working days.

6 What information should you provide?

- 6.1 believe housing will investigate all concerns that are raised, even if they are raised anonymously. However, we encourage you to give us more detailed information about your concerns including your name, your position and details of the wrongdoing/concern, including comments as to how you have been able to find out about the malpractice.
- 6.2 The more information that you can give us, the easier it is for us to progress our investigations. We will ensure that if you give your name, the person conducting the investigation will consider putting in place procedures to protect your identity. If you raise a concern on an anonymous basis, you should be aware that this may make it impossible for us to fully investigate your concerns.

7 The investigation and outcome

- 7.1 Once you have raised a concern, believe housing will carry out an initial assessment into the allegation reported to ensure a risk-based and proportionate approach to the matter and determine the scope of any investigation. In some cases, believe housing may appoint an investigation manager or team of investigators, including staff and/or specialists with relevant experience or specific knowledge of the subject matter.
- 7.2 The type of investigation required will depend on the nature of the problem you have raised, but in each case we will do the following:
- take a detailed note of your concern and, if possible, talk to you if more details are needed
 - investigate your concern in conjunction with the People Team and any other team relevant to the subject matter of your concern
 - respect your confidentiality as far as possible. If you do raise a concern, the person that you contact will take all reasonable steps to keep your identity confidential. However, in order to ensure that we can fully investigate your concern, it may not be possible to guarantee absolute confidentiality

- give you feedback as to the conclusion of the investigation and, where possible, tell you what action, if any, has been taken.

7.3 If you raise a concern that you know is false and/or raise a concern solely out of malice, then disciplinary action may be taken against you in accordance the procedures set out in our Disciplinary Policy. This disciplinary action may result in dismissal or termination of your relationship with us.

8 If you are not satisfied

8.1 While we cannot always guarantee the outcome you are seeking, believe housing will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

8.2 If you are not happy with the way in which your concern has been handled, as an employee you can raise it with the Executive Director of Finance and Investment or the Executive Director of Governance and Strategy. If you are not an employee then you should speak to the Chief Executive, Company Secretary or Chair of the Board.

9 Protection for whistleblowers

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. believe housing encourages openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People Team immediately. If the matter is not remedied, you should raise it formally using the Grievance Procedure.

9.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

10 Grievances

10.1 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

10.2 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out above, you should discuss with your line manager or, if this is not possible, the Executive Director of Governance and Strategy or Executive Director of Culture, Technology and Transformation as to which route is the most appropriate.

11 Recording concerns

- 11.1 The Executive Director of Governance and Strategy will maintain a register of all concerns raised under this policy.
- 11.2 This register will inform the quarterly confidential reports to the Audit Committee on any reported instances of whistleblowing.

12 Monitoring and review

- 12.1 The Audit Committee has overall responsibility for this policy.
- 12.2 This policy will be reviewed every three years unless there is a significant incident, important change in circumstances, legislation or regulation to warrant a review earlier than this timeframe.

13 Links to other policies and procedures

- 13.1 A suite of preventative and detective procedures, sources of assurance and probity arrangements have been established as set out below. This policy should also be read in conjunction with:
 - Codes of Conduct
 - Grievance Policy
 - Disciplinary Policy and Procedure
 - Equality, Diversity and Inclusion Policy
 - Anti-Fraud Policy
 - Fraud Response Plan and Procedure
 - Anti-Money Laundering Policy
 - Probity Policy.