

Whistleblowing Policy

February 2024

Monitoring and review

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Contents Page

- 1.0** Purpose and Scope
- 2.0** Statement of Intent
- 3.0** Roles and Responsibilities
- 4.0** Monitoring
- 5.0** Interdependencies and Related Policy
- 6.0** Associated Procedures

1.0 Purpose and Scope

This policy applies to all employees of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers, contractors, job applicants, volunteers, suppliers and partners are encouraged to use it.

It is important to Wolverhampton Homes (WH) that any fraud, misconduct or wrongdoing in the organisation is reported and properly dealt with.

This policy aims to:

- Encourage individuals to feel confident about raising any 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
- Reassure individuals that they should be able to raise genuine concerns without the fear of reprisals, even if they turn out to be mistaken
- Provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace

In most cases, it should not be necessary to alert anyone externally, however, legislation recognises that in some circumstances it may be appropriate to report concerns to an external body, for WH this would be the Regulator of Social Housing.

WH strongly encourage individuals to seek advice before reporting a concern to anyone external.

This policy does not form part of any employee's contract of employment and WH may amend it at any time.

2.0 Statement of Intent

The law provides protection for workers who raise legitimate concerns about specific matters. These are called “qualifying disclosures”. A qualifying disclosure is one made in the public interest by a worker who has reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- a concealment of any of the above;

is being, has been, or is likely to be committed.

If an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of WH activities (a whistleblowing concern) they should report it under this policy.

Whistleblowing concerns usually relate to the conduct of individuals, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect individuals if they raise the

matter with the third party directly. However, WH encourages individuals to report such concerns internally first. Employees of WH should contact their line manager for guidance.

This policy is for concerns that have a public interest aspect to it. This policy should not be used for concerns relating to an individual's own personal circumstances, such as the way they have been treated at work. In such a case they should use the Grievance Resolution Procedure.

If employees are unsure as to whether something is within scope of this policy you should seek advice before taking any action, from their line manager, Director or the HR team.

3.0 Roles and Responsibilities

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work
- Any matter raised under the procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence
- If misconduct is discovered as a result of any investigation under this procedure, WH disciplinary procedure will be used, in addition to any appropriate external measures
- Maliciously making a false allegation is a disciplinary offence
- An instruction to cover up wrongdoing is itself a disciplinary offence

If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a Director.

4.0 Monitoring

The policy will be reviewed every three years or in response to any changes in legislation or operational delivery and will be made available to managers and employees on WH document library.

5.0 Interdependencies and Related Policy

WH employees are expected to maintain standards of conduct both at work and outside of work. WH's Code of Conduct expands further on these standards.

When an individual makes a disclosure, WH will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

WH trusts that individuals will feel able to voice whistleblowing concerns openly under this policy, however if an individual wants to raise concerns confidentially, WH will make every effort to keep the individuals identity confidential. If it is necessary for anyone investigating the concerns to know the identity of the individual, this will be discussed with them.

Whilst anonymous allegations will be assessed, and action taken where appropriate, WH does not encourage individuals to make disclosures anonymously. It is much more difficult or impossible to properly investigate matters raised anonymously. It is also more difficult to establish whether any allegations are credible. Employees who are concerned about reprisals if their identity is revealed should speak to the HR team. If individuals are in any doubt, they can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. The contact details are contained within the Whistleblowing Procedure.

6.0 Associated Procedures

- Disciplinary Policy/Procedure
- Employee Code of Conduct
- Resolution (Including Grievances) Policy/Procedure