

The Wrekin

Housing Group

Whistleblowing Policy

1.0 Introduction

1.1 The Wrekin Housing Group (“the Group”) is committed to tackling all forms of malpractice and wrongdoing and maintaining the highest standards of integrity, fairness, openness, accountability and probity.

1.2 As part of this commitment, the Group encourages employees, customers, contractors and the general public who have any concerns about the way in which the Group, or any of its employees, carries out its work, to come forward and express those concerns.

The Whistleblowing policy has strong links with other policies such as our Complaints procedure, Safeguarding policy, Disciplinary policy and policies on abuse. In many cases, such concerns will be dealt with through these policies and procedures, such as those for resolving grievances, disciplinary matters, concerns relating to equality or for customers through the Complaints procedure.

1.3 It is important that we empower people to highlight concerns. Our officers responsible for these matters will make an informed judgement as to which process is followed on a case-by-case basis. We do realise that employees and others may prefer to express their concern on a confidential basis. The purpose of this policy, as part of the Code of Conduct, is to make it clear that employees and others can do just that and moreover that we will act upon all matters referred to us whether submitted confidentially or not.

All matters that are brought to our attention or that we become aware of irrespective of which policy they fall under, will be investigated and considered thoroughly in a fair, transparent and timely manner.

1.4 Concerns may be raised by others, not just employees; these may be involved residents, volunteers, contractors, suppliers or members of the public. For the purposes of this policy the term “*employees / others*” is used to capture all those to whom this policy may apply.

2.0 Policy Statement

- 2.1 This policy and the associated procedures are intended to underline the Group's commitment to its employees / others and its support for those who come forward to genuinely express their concerns. It aims to encourage employees and others to raise concerns at an early stage and in the right way. All employees have a duty of care and are encouraged to report any issues relating to safeguarding, health and safety or criminal activity and wrongdoing. The Group will take all concerns seriously and is committed to developing a climate of openness and free expression where raising concerns is welcomed, appreciated and acted upon positively.

3.0 Policy Scope

- 3.1 This policy applies to the following ("*employees / others*"):
- Employees
 - Board members
 - Agency staff
 - Contractors
 - Consultants
 - Suppliers
 - Customers / service users
 - Volunteers
 - Employees and principals of partner organisations.

4.0 Definitions

- 4.1 **Whistleblowing** is when an individual knows or suspects that there is some wrongdoing or unsafe working practices, for example, occurring within the organisation and alerts their employer accordingly.
- 4.2 **The Public Interest Disclosure Act 1998** gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure (as detailed in 4.3 below) when they reasonably believe it is in the public interest for them to do so.

4.3 **Examples of whistleblowing can be summarised as:**

- Where a criminal offence has been, is being or is likely to be committed;
- Where abuse has taken place (categories of abuse can be found in the Safeguarding Policy);
- Where a person has failed, is failing or is likely to fail to comply with any legal obligation;
- Where a miscarriage of justice has occurred, is occurring or is likely to occur;
- Where the health and safety of any individual has been, is being or is likely to be endangered;
- Unauthorised use of company funds, bribery or attempted bribery, money-laundering, fraud and corruption;
- Any serious matter as defined above;
- Where information or circumstances suggests that any one of the preceding matters has been, is being or is likely to be deliberately concealed.

4.4 The following circumstances are not qualifying disclosures under the Public Interest Disclosure Act 1998 and should be raised via the Grievance or Disciplinary Policy and Procedures as they are not covered by whistleblowing law:

- Personal grievances
- Complaints by an individual of being bullied, harassed or discriminated against
- Disciplinary matters

4.5 **Fraud** – can be summarised as an intentional false representation, including failure to declare information or abuse of position that is carried out to make gain, cause loss or expose another to the risk of loss.

4.6 **Bribery** – can be defined as the offer or acceptance of financial or non-financial benefits with the intent to influence another's conduct / decisions for personal or business gain or advantage.

4.7 **Reasonable belief** – exists where there is a reasonable basis to believe that a crime is being, will be or has already been committed.

4.8 **Qualifying disclosure** – means any disclosure of information that, in the reasonable belief of the employee / other, is made in the public interest.

4.9 **Malpractice** – improper, illegal and / or negligent professional behaviour. Failure to take action or make a report when required to do so.

5.0 Roles and Responsibilities

5.1 **Chief Executive** - has a duty of care to Group employees to ensure they are able to raise genuine concerns where a reasonable and honest suspicion exists without fear of victimisation, recrimination or harassment.

5.2 **Company Secretary and/or Governance Manager** has responsibility for:

- reviewing the whistleblowing report when it is received and will confirm if the matter comes under the whistleblowing or the grievance procedure.
- Monitoring the whistleblowing inbox in conjunction with the Legal Services Manager, Head of People Services and Chair of Audit and Assurance.

Reporting to the Audit and Assurance Committee on at least a quarterly basis any reports of whistleblowing.

5.3 **Group Head of People Services** - has responsibility for ensuring the organisation operates this policy correctly and within the confines of the law.

5.4 **Managers** - are responsible for ensuring employees are aware of their responsibilities to raise any concern they have and wherever appropriate to discuss these concerns with their line manager in the first instance.

5.5 **Employees** - are responsible for reporting any genuine concerns with regards to any wrongdoing, fraud, corruption, malpractice and danger relating to;

- Risk to service users
- Risks to relatives and/ or the public
- Risks to staff
- Fraud and financial malpractice
- Criminal acts
- Failure to comply with a legal obligation, including negligence
- Failure to comply with a professional obligation
- Concerns about an individual's fitness to practice
- A risk to health and safety
- Any attempt to intentionally withhold information regarding any of the above.

The Wrekin <u>Housing Group</u>	Policy control sheet Whistleblowing Policy Policy reference number – 2024/023
Policy Author	Angelina Hicklin Governance Manager
Direct Lead	Jan Lycett Executive Director of Business Solutions/Company Secretary
Version	2.0 – September 2024
Target audience	Employees and Board Members of the Group entities <ul style="list-style-type: none"> • The Wrekin Housing Group • Choices Housing Association • Old Park Services • Strata Housing Services Including <ul style="list-style-type: none"> • Agency staff • Contractors • Consultants • Suppliers • Customers / service users • Volunteers
Consultation	Executive Management Group Heads of Service Peoples Services Manager Employee Forum Trade Union Wrekin Voices and Customer Committee Members
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy
Date of Data Privacy Impact Assessment	19 th April 2024
Approving Body	The Wrekin Housing Group Board
Date of final approval	25 th September 2024
Implementation date	25 th September 2024
Monitoring arrangements	Reports of Whistleblowing will be monitored by the Company Secretary and Group Head of People Services.
Reporting	Audit & Assurance Committee via Probity Report on a quarterly basis
Review date	March 2027
Expiry date	September 2027
Review cycle	3-year review cycle
Policy category	Corporate / Human Resources

Associated policies and procedures	NHF Code of Governance Code of Conduct / Conduct Becoming policy Safeguarding policy Fraud & Bribery policy Grievance policy Disciplinary policy
Policy location	Sharepoint The Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Catherine Rogerson	This policy replaces the two separate policies that were in place for The Wrekin Housing Group and Choices Housing Association. The policy and procedure have been separated.	1.0 - September 2021	Approved by The Wrekin Housing Group Board 20 th September 2021
Angelina Hicklin	Reviewed in line with policy and review cycle. This policy has been updated to provide clarity over when an incident is a grievance and when it is a whistleblowing incident.	2.0 – September 2024	Approved by the Wrekin Housing Group Board - 25 th September 2024.