

### Whistleblowing – Internal Procedure

#### 1.0 Introduction

1.1 This procedure document should be read in conjunction with the Whistleblowing Policy and Procedure.

#### 2.0 Scope

2.1 This procedure applies to Wrekin Housing Group direct employees.

#### 3.0 Internal Procedure statement

3.1 The purpose of the procedure is to ensure that employees reporting matters of concern through the Whistleblowing Policy are aware of the internal procedure that will take place to ensure their concern is dealt with and all appropriate steps are met.

3.2 This procedure will define the internal process should the Whistleblowing Policy be found not appropriate and when it may be better dealt with under the Grievance Policy and procedure or Bullying and Harassment Policy.

3.3 The procedure will also be clear what protections are in place during a whistleblowing complaint and what would be considered a breach of those protections that could lead to formal action being taken against the employee.

#### 4.0 Reporting

4.1 All Whistleblowing complaints received by the manager, or the Executive Director, will be forwarded to the Company Secretary for assessment of the grounds of the complaint.

4.2 It shall be the decision of the Company Secretary if the complaint is deemed to be Whistleblowing and treated as such with the associated Policy and Procedure.

4.3 Where the Company Secretary deems that the complaint does not meet the Whistleblowing criteria, they will discuss this with the Head of People Services. It may be necessary to refer the employee to the Grievance Policy and Procedure or Bullying and Harassment Policy if deemed appropriate.

#### 5.0 Whistleblowing

5.1 On confirmation that a complaint is Whistleblowing, the Company Secretary will convene a panel to investigate the complaint.

5.2 The Panel will meet with the employee and their representative and a Terms of Reference will be agreed and shared with the employee so all parties are informed of the scope of the investigation.

- 5.3 The Panel will keep, where possible and in agreement with the employee, the identity of the employee confidential when interviewing third parties.
- 5.4 Upon conclusion of the investigation, the panel will meet with the employee who raised the whistleblowing complaint and provide an outcome to their findings.
- 5.5 The decision of the panel is final and the internal whistleblowing process will cease. However, should the employee still feel there is a case to answer and they have not already, they can contact the relevant regulatory bodies to process their complaint.
- 5.6 If the employee feels aggrieved with the outcome or process undertaken, a Grievance can be raised and a Grievance Resolution Form completed. This will be considered by the Company Secretary for further recourse (6.0).
- 5.7 Although all employees who raise a whistleblowing complaint are protected in regards to the disclosure they have made, if through the course of the investigation and/or it's conclusion the employee breaches the values and behaviours expected of a Group employee, then disciplinary action may be deemed necessary and the employee will not be considered to be covered within the Public Disclosure Act 1998 as a protected disclosure (go to 7.0).

## **6.0 Grievance**

- 6.1 Upon the Company Secretary deeming the complaint to be a grievance, this will be covered by the Grievance Policy and Procedure.
- 6.2 The employee will complete a Grievance Resolution Form and an investigator will be appointed to hear the grievance.
- 6.3 The process relating to a Grievance must be followed in line with the Grievance Policy and Procedure.

## **7.0 Disciplinary Action**

- 7.1 If, during the course of the whistleblowing investigation or thereafter, the employee's conduct becomes such that they are breaching the code of conduct and failing to demonstrate the values and behaviours of a Group employee, this may lead to disciplinary action being instigated.
- 7.2 It must be deemed appropriate for disciplinary action to be taken and that this decision is not based on the act of raising a whistleblowing complaint. The Company Secretary will make that decision, and supported by the Head of People Services, will convene a disciplinary investigation team.
- 7.3 An impartial investigation team will be appointed and the Disciplinary policy and procedure will be utilised.

## Summary of changes table

<b>Revision history</b>			
<b>Author</b>	<b>Summary of changes</b>	<b>Version</b>	<b>Authorised by &amp; date</b>
Mandy Parkinson	<p>New procedure introduced outlining the internal process for Whistleblowing.</p> <p>This has been introduced in line with the three yearly review of the policy and procedure.</p>	1.0 - September 2024	The Wrekin Housing Group Board – 25 <sup>th</sup> September 2024