



WHITE HORSE HOUSING

Policy Name	Policy 11A – Whistleblowing Policy	
Author	Chief Executive	
Tozers Reviewed? – HR Policies only	Yes	
Board Approval	November 2015 November 2019 November 2025	
Related Documents	Anti-Fraud Policy Anti-Bribery Policy Money Laundering Policy Governance Framework	

1. Introduction

- 1.1 The Public Disclosure Act 1998 aims to protect individuals who make certain disclosures of information in the public interest. This is referred to as 'whistleblowing'.
- 1.2 This policy applies to all employees and Board members. The policy also applies to any other person who may have serious concerns relating to conduct or practices within our organisation.
- 1.3 You are a 'whistleblower' if you report certain types of wrong doing. The wrong doing you disclose must be in the public interest. This means it must affect others, for example the general public. As a whistleblower you are protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.
- 1.4 This policy aims to:
- Encourage staff and Board members to feel confident in raising concerns, internally in the first instance, and to question and act upon concerns about wrongdoing.
 - Provide avenues for staff and Board members to raise concerns and receive feedback on any action taken.
 - Allow staff and Board members to take the matter further if they are dissatisfied with our response.
 - Offer staff and Board members protection for whistleblowing in good faith.

1.5 We are committed to the highest standards of openness, probity and accountability. In that, we will enable staff and Board members to voice concerns in a responsible and effective manner. We encourage those who have serious concerns about any aspect of our work to come forward and speak up without fear of reprisal.

2. General Principles - Whistleblowing Complaints

2.1 You are protected by law as a whistleblower if you report any of the following:

- ✓ a criminal offence, for example fraud;
- ✓ someone's health and safety is in danger;
- ✓ risk or actual damage to the environment;
- ✓ a miscarriage of justice;
- ✓ the company is breaking the law, for example does not have the right insurance;
- ✓ you believe someone is covering up wrong doing.

2.2 This list is not exhaustive but is intended to give some examples of the issues which may be covered by this policy. We will support all those who raise an honest and reasonable suspicion of wrong doing, both during any investigation and following its conclusion. We will ensure staff and Board members will be protected from reprisals or victimisation where they raise concerns in good faith. You should be aware that disclosures made to the media will not normally provide you with protection in terms of the Public Disclosure Act 1998, or this policy.

2.3 There might be certain situations where disclosures need to be made to external regulators when the perceived wrong doing involves senior members of staff or the members of the Board. Complaints do not count as whistleblowing. Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law or this policy, unless your particular case is in the public interest. These should be reported through our grievance process.

2.4 In the first instance, any whistle blowing reports should be made directly to the Chief Executive. The Chief Executive will undertake a formal review of the issue and take appropriate action.

2.5 Should the issue regard the actions or conduct of the Chief Executive, then the issue should be reported directly to the Chair of the Board. The Chair will undertake a formal review in conjunction with the Chair of the Audit and Risk Committee.

2.6 Contact details for the Chief Executive and the Chair of the Board are included at the end of this document.

3 Malicious or Vexatious Complaints

3.1 This document sets out the protections afforded to those members of staff, or Board members, who report a genuine concern under this policy. However, should the subsequent investigation find that the report was made knowing that it is untrue, or is made maliciously or is continuously repeated without good reason, then the member of staff, or Board member, who made the report may be subjected to disciplinary action under the Association's Disciplinary Procedure.

4 Roles, Responsibilities and Delegated Authority

4.1 The Chief Executive is responsible for having effective arrangements and a policy for whistleblowing. The policy should be made readily available and promoted.

4.2 The Senior Management team are responsible for ensuring that employees are aware of, and understand, the whistleblowing policy. The Chief Executive will ensure the Board members fully understand their roles and responsibilities regarding whistleblowing.

5 Monitoring and Review

4.1 This policy will be reviewed every 3 years, or earlier if deemed appropriate through changes in legislation or best practice.

Contact Details:

Name	Position	Contact Details
Steve Warran	Chief Executive	Mob: 07753221400 E-mail: steve.warran@whitehorsehousing.co.uk
David Trethewey	Chair of the Board	Mob: 07976 938256 E-mail: trethed@outlook.com