



WHISTLEBLOWING POLICY

1.0 Introduction and Aim

- 1.1 This policy sets out Weaver Vale Housing Trust's (the Trust) approach to Whistleblowing.
- 1.2 The primary aims of this policy are to:
 - Allow any individual including but not restricted to board members, employees (including casual, temporary and), volunteers or a customer who has a genuine concern or a reasonably held suspicion about a situation, or incident, the opportunity to voice their concerns without fear of dismissal, disadvantage or retribution.
 - Ensure that all reported concerns are investigated fairly and with the minimum of delay.
- 1.3 This policy also identifies the Trust's approach in terms of good practice and presents a set of principles for the Trust and Whistleblowers to work with in an open and transparent framework, which links to its values of openness, fairness and respect.

2.0 Scope

- 2.1 This policy applies to Board Members, all employees and customers.
- 2.2 The policy complies with all relevant statutory provisions and will be updated to take into account any future relevant legislation.

3.0 Principles

- 3.1 All employees have a duty of care to raise any reasonably held suspicions or matters of concern which may cause damage to their employer's business or reputation.

If any suspicion or concern raised by an employee is proven to be both unfounded and maliciously made, then the employee will be subject to the usual investigation procedure and possible disciplinary action.

- 3.2 This policy shall in no way detract from a Whistleblowers rights or responsibilities within other related policies (eg Disciplinary, Grievance or Health & Safety policies).

Note the term “Whistleblowers” relates to any person who uses this policy.

- 3.3 Whistleblowers are encouraged to put their name to their concerns, as anonymous concerns are much less powerful. However, anonymous concerns will be investigated, as far as possible, within the agreed investigation procedures.

These matters may include, but are not restricted to, possible concerns about fraud, bribery, corruption, falsification of records, unauthorised absence from work, theft or other criminal offences, abuse (sexual, racial, physical or psychological), neglect, bullying, harassment, health and safety, damage to the environment or other risks to the Trust.

- 3.4 Whistleblowers will be able to raise such concerns on the understanding that they have nothing to fear and will not suffer reprisals or disadvantage.
- 3.5 Whistleblowers concerns will be treated confidentiality, except in cases when the Police or Social Services need to be informed or where an employee is accused of misconduct, when a disciplinary hearing will be required.
- 3.6 The Public Interest Disclosure Act 1998 gives statutory protection, within defined parameters, to staff who make disclosure about a range of subjects, including fraud and damage to health and safety, which they believe to be happening within the organisation which employs them. The Enterprise and Regulatory Reform Act (ERRA) 2013 provides further protection for whistleblowers.
- 3.7 To obtain protection Whistleblowers must first disclose the information to the employer or to a body prescribed by the Secretary of State for the purposes of receiving such information.

Further guidance on Whistleblowing can be obtained from **Gov.uk**, via “Employing People”, Whistleblowing for Employees.

4.0 What Whistleblowers should do:-

4.1 Whistleblowers should:-

- Make the disclosure on the basis of reasonable belief (this means with honest intent and without malice).
- Believe that the information he or she is disclosing is substantially true.
- Make the disclosure to the right person (eg a Director, a Manager or Chair of the Board).

- Make sure that he/she is clear what the specific issues are (it may help to write down what the actual facts are, rather than rely on memory).
- Consider if it would be helpful to discuss the matter with a Trades Union representative, who may be able to assist with the matter.
- Consider if it would be more appropriate for a customer to use the customer complaints procedure. Help and advice can be gained from the directorate complaints co-coordinators. The names of these co-coordinators are available from the complaints procedure or a Director.
- If the matter could be regarded as relating to Fraud or Bribery, then the Trust has an Anti-Fraud and Bribery Policy which clearly sets out the procedure by which any allegations or suspicion of fraud or corruption will be investigated. Employees should firstly raise any concerns about possible fraud or bribery with their line manager, who will pass the matter on to the Anti-Fraud Co-ordinator who is the Director of Finance & Business Services.
- If you would prefer you can contact any of the following directly and confidentially;
 - Chair of Board
 - Chair of the GAAC
 - Chief Executive
 - Directors of Property Services, Neighbourhoods & Wellbeing and Technology and Business Transformation.
 - The Regulation & Assurance Manager
 - The Internal Auditors (Natalie Jackson , Manager, BDO)
Natalie.Jackson@bdo.co.uk o

4.2 Paragraph 4.4 provides guidance on reporting any concerns raised regarding the chief executive, directors or board members and the contact details for the Chair of the Board and the Chair of the GAAC.

4.3 If any Employee Whistleblower is not sure who to contact about their concerns or if the matter is complex and/ or sensitive then he/she should discuss the matter with the Director of HR Manager. If you prefer to speak to someone independent of the Trust, you can speak to the charity the Public Concerns at Work via their Whistleblowing Advice Line on 020-7404-6609 or helpline@pcaw.co.uk their lawyers give free confidential advice.

Complaints/concerns about the Chief Executive, Directors or Board Members

4.4 If a Whistleblower wishes to raise a matter which may involve a senior employee or board member of the Trust, then they should contact the following people:-

- Concerns about a Director should be made to the Chief Executive.

- Concerns about the Chief Executive should be made to the Chair of the GAAC.
- Concerns about the Deputy Chair of the Board should be made to the Chair of the Board, and the Chief Executive.
- Concerns about the Chair of the Board should be made to the Chair of the GAAC and the Chief Executive.

4.5 The Chair of the Board and the Chair of the GAAC can be contacted via the following dedicated email addresses:

- Chair of the Board: WB.ChairOftheBoard@wvht.co.uk
- Chair of the GAAC: WB.ChairoftheGAAC@wvht.co.uk

5.0 Feedback

5.1 Any Whistleblower who raises concerns with this policy will be advised when the situation has been resolved and will receive feedback as appropriate.

If, after raising concerns internally within the Trust, any Whistleblower feels that they are not satisfied with the outcome then the concern should be referred to the Chair of the Board (see paragraph 4.5).

6.0 Responsibility

6.1 The Director of Finance and Business Services is responsible to the Chief Executive and the Board for ensuring the effective implementation of this policy and ensuring that all employees involved in this process have access to the relevant guidance and procedures.

7.0 Customer Profiles and Accessing Services data

7.1

Data from the following sources, regarding Customer profiling and the way in which they access the Trust's services, was utilised in implementation / review of this policy (as indicated by √)			
Star Tracker Survey		Customer Satisfaction Surveys	
Scrutiny Panel		Tenant Partners	
Customer Focus Groups		KPI's (service performance)	
Complaints Review Panel		Other (specify)	
Community Groups			
<i>Insert explanatory narrative (where appropriate)</i>			

Not relevant to this policy

8.0 Customer Influence (Consultation)

8.1

The Trust has been influenced by the following customer groups regarding the implementation / review of this policy (as indicated by ✓)			
Customer Voice Panel		Resident Involvement Group (specify which)	
Customer Focus Groups		Community Groups	
E Voice		Other (specify which)	
Questionnaire		Other	
<i>Insert explanatory narrative (where appropriate)</i>			
Not relevant to this policy			

Author of Policy	Date of Approval	Approved by:	Implementation date:	Next Review Date
Linda Caslin	24.10.2018	GAAC	1 st November 2018	2022/2023

EQUALITY IMPACT ASSESSMENT (EIA)

The aim of this EIA is to improve the work of the Trust by making sure we don't discriminate and where possible promote equality.

NAME OF POLICY OR ACTIVITY	Whistleblowing Policy
EIA CARRIED OUT BY	Linda Caslin, Regulation & Assurance Manager
DATE	September 2018
AIMS AND PURPOSE OF POLICY OR ACTIVITY	To allow individuals the opportunity to voice their concerns without fear of dismissal, disadvantage or retribution.

The EIA focuses on assessing the impact on people with protected characteristics. This involves anticipating the consequences of activities on these groups and making sure any negative consequences are minimised and opportunities for promoting equality are maximised. For each protected characteristic, indicate whether there will be a positive or negative impact or no impact from this policy or activity.

PROTECTED CHARACTERISTIC	IMPACT	COMMENT
	Positive or Negative or No Impact	Needed if there is a Negative Impact. Also include the Action to be taken to Reduce Impact
Age	No Impact	
Disability	No Impact	
Gender Reassignment	No Impact	
Being Married or in Civil Partnership	No Impact	
Being Pregnant and or Maternity Leave	No Impact	
Race (Including colour, nationality, ethnic or national origin)	No Impact	
Faith or Religion or Belief or Lack of Belief	No Impact	
Sex	No Impact	
Sexual Orientation	No Impact	

Any Further Actions Required:	None
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