

# Whistleblowing for customers and the public policy

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**All policies are the responsibility of the leadership team to own, deliver, disseminate, monitor and review**

## PURPOSE

This policy is designed to ensure that anyone who is not one of our employees, who has serious concerns about improper conduct or malpractice by any member of Selwood Housing Group, including staff, contractors or our board of directors, can come forward on a confidential basis to express those concerns.

## UNDERPINNING PRINCIPLES

We must comply with the Regulator of Social Housing Governance and Financial Viability Standard 2015 and the Tenant Involvement and Empowerment Standard 2017.

The following documents are also of particular importance to this policy.

- ⊕ Anti-money laundering policy
- ⊕ Code of conduct
- ⊕ Fraud, bribery and corruption prevention policy
- ⊕ Procurement and contract management policy

## POLICY DETAIL

### Making a report

Whistleblowing is the process by which people can report improper conduct or malpractice; it is not about service failures as these are dealt with through our complaints procedure.

Examples of improper conduct or malpractice include, but are not limited to:

- a failure to comply with a legal obligation
- abuse or neglect of vulnerable people

- breaches of confidentiality
- corruption
- criminal activity
- dangers to health and safety
- falsifying records
- fraud
- gross negligence
- harassment, victimisation or discrimination
- non-disclosure of interests
- offering or accepting bribes or other inducements.

We are committed to the highest standards of probity, openness and accountability, and take seriously the impact that issues such as those listed above can have on us as an organisation and on the people living in the communities we serve. If someone has any doubts about whether a scenario falls within the whistleblowing criteria, they should refer to the following section of this document titled 'Who to contact'.

Anonymous reports will be accepted and thorough investigations carried out, but as the identity of the person making the report is unknown, the extent of these investigations may well be limited in nature.

Malicious reports could lead to action being taken against the person making the report for defamation of character, and/or breach of tenancy if the person making the report is a customer.

## **Who to contact**

People should initially report their concern to the personal assistant to the group chief executive. The group chief executive will then either lead the investigation themselves or delegate it to one of our executive directors, in conjunction with the group HR manager. Whilst we would normally expect concerns to be raised in this way, the whistleblower can alternatively contact the chair or vice chair of our board of directors or the Regulator of Social Housing. Criminal offences should also be reported to the Police.

Contact details of these persons and organisations can be found in our whistleblowing procedure, which also sets out how whistleblowing reports will be dealt with.

If the person is unhappy with the way that their report has been dealt with, they should contact the Regulator of Social Housing.

## **Confidential Reporting**

As whistleblowing includes the processing of data, this information is dealt with in accordance with our data protection policy, data sharing guidance document, our whistleblowing procedure and in accordance with our privacy statement.

People may feel more confident about reporting concerns if they are accompanied by another person such as a relative or friend, and we welcome and support such arrangements. They can also seek independent advice from Citizens Advice, a housing advice centre, a law centre or a solicitor.

The identity of the whistleblower and any witnesses is never revealed except where:

- ⊕ they consent to the disclosure
- ⊕ it is required through any criminal law proceedings (e.g. where they may need to come forward as a witness)
- ⊕ they maliciously make a false statement that they know not to be true.

and the identity of the person under investigation is also protected in the same way.

## **Dealing with concerns**

Any concerns that a person has about their safety or that of any family members will be taken into account, both during and after the investigation, and appropriate measures will be taken to ensure that people are supported and protected from reprisals, victimisation or harm. This applies equally to situations where the concern is justified, or where the person comes forward in good faith but the concern later turns out to be unfounded.

## **Monitoring**

Whistleblowing reports which have been substantiated will be reported to the next board meeting, and all reports made will be summarised in our annual report.

## **SIGNPOST**

- Data Protection Act 2018
- General Data Protection Regulation (EU) 2016/679
- Board code of conduct
- Child protection policy and procedure
- Data sharing guidance
- Data subject request procedure
- Equality and diversity policy
- Financial regulations
- Gifts and hospitality policy
- Governance manual
- Group data protection policy
- Modern slavery statement
- Safeguarding adults policy and procedure
- Selwood Housing Society Limited Articles of Association
- Tenancy fraud policy
- Whistleblowing for customers procedure



**Policy Review Date – 5 November 2022**



## **Decision-making Record**