

## Whistleblowing for customers and the public procedure

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### PURPOSE

This procedure details how someone who is not one of our employees can report a serious concern on a confidential basis, about improper conduct or malpractice by any member of Selwood Housing Group, including staff, contractors or our board of directors, and how that report is managed.

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- 2. Reporting a concern**
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### PROCESS

#### 1. Publicity

A whistleblowing customer information sheet can be found on our website, which contains information for customers and the public all in one place about the whistleblowing policy and procedure (see appendix 1).

We also display posters in the communal areas of our buildings, to advise customers and the public about how they can report any serious concerns about our staff, contractors or board members (see appendix 2).

#### 2. Reporting a concern

Reports should initially be made to the personal assistant to the group chief executive by one of the following means:

-  Email – [whistleblowing@selwoodhousing.com](mailto:whistleblowing@selwoodhousing.com) (the group chief executive will also receive a copy of this email)

- ✚ Letter – Personal assistant to the group chief executive, Bryer Ash Business Park, Bradford Road, Trowbridge, Wiltshire BA14 8RT (the envelope should be marked 'private and confidential')
- ✚ Telephone – 01225 715904

If the whistleblower is not happy to report their concern in this way, they can contact either the chair or vice chair of our board directors by email using the following format:

- ✚ [Name.Surname@selwoodhousing.com](mailto:Name.Surname@selwoodhousing.com).

The names of the chair and vice chair of our board of directors can be found on our website, which can also be accessed by clicking on the following link:

<https://www.selwoodhousing.com/>

Alternatively, they can contact the Regulator of Social Housing whose contact details are as follows.

- ✚ Email – [enquiries@rsh.gov.uk](mailto:enquiries@rsh.gov.uk)
- ✚ Letter – Referrals and Regulatory Enquiries team, 1<sup>st</sup> Floor – Lateral, 8 City Walk, Leeds LS11 9AT
- ✚ Telephone - 0300 124 5225

Offences of a criminal nature should be reported to the Police

- ✚ Telephone - 101
- ✚ Emergency – 999

or anonymously via Crimestoppers.

- ✚ Online – [crimestoppers – give information form](#)
- ✚ Telephone – 0800 555 111

As far as whistleblowing reports to us are concerned, including those made to the chair or vice chair of our board directors, the person making the report should be advised that:

- i) their report will be acknowledged within 2 working days, giving the name of the person who will be carrying out the investigation
- ii) the acknowledgement will state that:
  - they will be notified of the outcome of the investigation, including any actions proposed or taken, within 2 weeks of the report being received, unless more time is needed to complete the process
  - if more time is required, they will be given a revised investigation completion date before the end of the 2-week period

- the notification of the outcome of the investigation may not include all of the details for reasons of confidentiality
- iii) whilst their confidentiality will always be maintained where it is within our power to do so, in certain circumstances they may need to come forward at some future date as a witness
- iv) their concern will initially be referred to the group chief executive, who will either carry out the investigation or delegate it to one of the executive directors, in conjunction with the group HR manager
- v) a confidential meeting can be arranged for them with the person investigating the report if necessary, and if they wish they can be accompanied by another person such as a relative, friend or advocate
- vi) they will be supported and protected from reprisals or victimisation, and this will apply equally to situations where the concern is justified, or where they come forward in good faith, but the concern later turns out to be unfounded
- vii) there are consequences relating to false reporting, because making a false statement that damages the reputation of an individual or a business is defamation of character, and the law is designed to protect and compensate individuals or companies from having their character and reputation improperly damaged
- viii) any information obtained will be covered by our privacy statement, a copy of which will be sent to them.

### **3. Case management**

The investigator will log the case and all supplementary information on their 'documents' folder our computer system, in a password protected folder titled 'whistleblowing report - date' (the date being when the report was initially received). This folder will form the basis of the whistleblowing report case management system, and the investigator must therefore notify the group HR manager of the password for the folder. This will ensure that information is stored securely and that internal access to that data is granted on a strictly 'need to know' basis. Information related to the case must not be stored on our operating system QL, as this could allow unnecessary access by staff.

At this stage, it is not immediately necessary for a copy of our privacy statement to be given or sent to the person under investigation, as this might compromise the investigation. However, this should be considered on a case by

case basis, and if the person under investigation is not to be informed about the investigation and given a copy of our privacy statement, the reasons for not doing so should be documented.

Informing any witnesses mentioned in the whistleblowing report that a case has been opened should be done as soon as possible, and they should also be given a copy of our privacy statement. They must also be advised that the matter is confidential and not to inform or discuss the case with anyone else.

Only information relative to the case must be collected, and anything included in the report which is of no relevance or interest to the allegations must not be processed further.

If the concern involves an alleged criminal offence, the whistleblower should be told to report this to the police, but informed that because of the serious nature of the report we are also under an obligation to notify the police and supply them with their personal details.

The investigator must carry out their investigation thoroughly and impartially, listening to the accounts of all parties involved. They should also take any measures felt necessary to protect the customer's safety and that of any family members.

#### **4. Access to personal information**

Requests for access to personal information will be dealt with through our data subject request procedure.

#### **5. Malicious reports**

Malicious reports will be assessed to determine if action should be taken against the whistleblower, either for defamation of character or, if the person is a customer, for breach of tenancy.

#### **6. Monitoring**

Whistleblowing reports which have been substantiated will be reported to the next board meeting.

### **SIGNPOST**

- Data Protection Act 2018
- General Data Protection Regulation (EU) 2016/679
- Anti-money laundering policy
- Board code of conduct
- Child protection policy and procedure
- Code of conduct
- Data sharing guidance
- Data subject request procedure
- Equality and diversity policy
- Financial regulations
- Fraud, bribery and corruption prevention policy
- Gifts and hospitality policy
- Governance manual
- Group data protection policy
- Modern slavery statement
- Procurement and contract management policy
- 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

## **Appendix 1**



### **Whistleblowing**

#### **How customers can report concerns of a serious nature**

##### **What is whistleblowing?**

Whistleblowing is when someone reports serious concerns about something that one of our staff, contractors or board members has done or failed to do.

Examples of whistleblowing concerns might be:

- A failure to meet our legal duties as a landlord e.g. failure to carry out fire, electrical or gas safety checks and actions as required
- a member of our staff engaging in criminal activity such as taking bribes
- a member of our staff allowing children or vulnerable adults to be put at risk of harm

##### **How to report a concern**

Reports can be made to the confidential email address:

- email – [whistleblowing@selwoodhousing.com](mailto:whistleblowing@selwoodhousing.com)
- by letter – to the personal assistant to the group chief executive, Selwood Housing, Bryer Ash Business Park, Bradford Road, Trowbridge, Wiltshire BA14 8RT (the envelope should be marked 'private and confidential')
- by telephone – 01225 715904

##### **Other ways to report**

If you are not happy to report your concern using the methods suggested above, you can contact one of our board members by email using the following format:

- [Name.Surname@selwoodhousing.com](mailto:Name.Surname@selwoodhousing.com)

A list of our board members can be found on our website, which can also be reached by clicking on the following link:

<https://www.selwoodhousing.com/about-us/who-we-are/our-board-of-directors/>

Or you can contact the regulator of social housing who oversees housing associations, contact details are as follows:

- email – [enquiries@rsh.gov.uk](mailto:enquiries@rsh.gov.uk)
- letter – referrals and regulatory enquiries team, 1<sup>st</sup> floor – Lateral, 8 City Walk, Leeds LS11 9AT
- telephone - 0300 124 5225

Offences of a criminal nature should be reported to the Police:

- telephone - 101
- emergency – 999, or anonymously via Crimestoppers.
- online form via Crimestoppers - <https://crimestoppers-uk.org/give-information/forms/pre-form>
- telephone – 0800 555 111

### **What happens next**

We will let you know that we have received your report within two working days, giving the name of the person who will be investigating it.

You will be told the result of the investigation, including any actions proposed or taken, within two weeks, unless more time is needed to complete the investigation. If more time is required, we will give a new completion date.

In telling you the result of the investigation, we may not be able to include all details, for reasons of confidentiality.

If you are acting in good faith when you raise a concern, we will investigate it and make sure that you do not face harassment or victimisation for doing so. However, we will not tolerate someone raising something they know is not true, to cause trouble for the organisation or for a member of our staff. If this happens, we will take appropriate action.

If we are asked to protect your identity we will, however there may be circumstances when we have to disclose information, for example if required to do so by a court of law.

We will also accept and investigate anonymous reports, as far as possible.



## **Whistleblowing is different to making a complaint**

A complaint is where you have concerns about a **service** you have received that is not up to standard or where we have failed to provide a service. Examples include a contractor who does not turn up for a pre-arranged appointment or a member of staff who is rude to customers and acts unprofessionally.

You can find our complaints policy here -

<https://www.selwoodhousing.com/about-us/how-were-doing/complaints-and-compliments/>

## Appendix 2

### Whistleblowing poster



## How to report a serious concern

**Whistleblowing is when someone reports a serious concern about something that one of our staff, contractors or board members has done or failed to do.**

Examples may be:

- A failure to meet a legal duty
- A member of staff engaging in criminal activity
- A member of staff placing children or vulnerable people at risk of harm

**To report a serious concern:**

**Email** [whistleblowing@selwoodhousing.com](mailto:whistleblowing@selwoodhousing.com)

**Write** to our Group CEO and mark as 'confidential'

**Call** 01225 715 904

