



## Whistleblowing Policy

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Department:

Organisation

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Version:

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Author:

CEO

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## **1. INTRODUCTION**

- 1.1. An important aspect of accountability and transparency is a mechanism to enable staff, agency workers and contractors not employed by Hill Homes to voice concerns in a responsible and effective manner.
- 1.2. Whistleblowing refers to disclosures that are made in the public interest; it is not an appropriate policy for workers to use to air private grievances. Private grievances should be raised under the harassment, complaint or disciplinary policies.
- 1.3. Whistleblowing refers to the reporting of suspected misconduct, illegal acts or failure to act and it is often workers who are the first to realise that there is, or may be, something seriously wrong.
- 1.4. It is a fundamental term of every contract of employment (or contractor's terms) that an individual will not disclose confidential information about Hill Homes' affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal.
- 1.5. Hill Homes believes that whistleblowing is a positive act that can make a valuable contribution to our efficiency and long-term success.
- 1.6. It is not disloyal to colleagues, or to Hill Homes, to speak up. We are committed to achieving the highest possible standards in all that we do.

## **2. DEFINITIONS**

- 2.1. Hill Homes refers to the group of companies comprised of Hill Homes Housing Association and Hill Homes Care Ltd.
- 2.2. A qualifying disclosure is defined as one that is made in good faith by an individual who has a reasonable belief that one of the following has been, or is likely to be committed:
  - a criminal offence;
  - a miscarriage of justice;
  - financial irregularities;
  - an act creating risk to health and safety;
  - an act causing damage to the environment;
  - a breach of any other legal obligation; or
  - concealment of any of the above.
- 2.3. Workers refers to employees, agency workers and contractors.

## **3. AIMS AND OBJECTIVES**

- 3.1. The aim of this policy is to encourage workers who have serious concerns about any aspect at Hill Homes to come forward and voice those concerns.

- 3.2. The policy is designed to ensure that workers can raise their concerns about wrongdoing or malpractice within Hill Homes without fear of victimisation, subsequent discrimination, disadvantage or dismissal.
- 3.3. It is intended to encourage, and enable, workers to raise serious concerns within Hill Homes in the first instance rather than ignoring the problem or blowing the whistle externally.
- 3.4. The policy aims to:
- encourage workers to raise serious concerns at the earliest opportunity
  - ensure that everyone receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied with the response
  - reassure workers that they will be protected from possible reprisals or victimisation if they have made a disclosure in good faith
- 3.5. This policy is intended to enable those who become aware of wrongdoing at Hill Homes to report their concerns at the earliest opportunity so they can be properly investigated.
- 3.6. This policy is designed to deal with disclosures made in the public interest. It is not designed to deal with private grievances. These will be dealt with using the harassment, complaint or disciplinary policies.
- 3.7. This policy is not designed to question financial or business decisions taken by Hill Homes nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.
- 3.8. Once the whistleblowing procedures are in place, it is reasonable to expect workers to use them rather than air their complaints outside the organisation.

#### **4. POLICY STATEMENT**

- 4.1. Hill Homes is committed to good practice and high standards and to supporting all workers who make a qualifying disclosure.
- 4.2. Hill Homes provides whistleblowing training for all employees.
- 4.3. Hill Homes recognises that the decision to report a concern can be a difficult one to make. Any worker that honestly and reasonably believes what they are saying is true should have nothing to fear because they are doing their duty to the organisation, their colleagues and all Hill Homes' tenants and clients.
- 4.4. Hill Homes will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect anyone who raises a concern in good faith.

- 4.5. Any harassment or victimisation of a whistleblower will be treated as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedures.

## **5. LEGISLATION, REGULATION AND GUIDANCE**

- 5.1. The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for individuals who raise legitimate concerns about specified matters
- 5.2. The Enterprise and Regulatory Reform Act 2013 amends the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters which are deemed to be in the public interest

## **6. CONFIDENTIALITY**

- 6.1. All concerns will be treated in confidence and every effort will be made not to reveal the identity of any worker if that is their wish.
- 6.2. If a worker does not feel safe in making a disclosure via their line management structure, they may make it via the HR team.
- 6.3. If disciplinary, or other proceedings, follow the investigation, it may not be possible to take action as a result of a disclosure without the help of the worker so they may be asked to come forward as a witness. If the worker agrees to this, they will be offered advice and support.

## **7. MONITORING AND REPORTING**

- 7.1. Hill Homes will maintain a central record of disclosures made under the whistleblowing policy. This will include:
  - the nature of the disclosure
  - the action taken
- 7.2. The Finance, Risk and Audit Committee will be advised of any whistleblowing disclosures as a standing item on the agenda for each of their meetings.
- 7.3. A summary of whistleblowing disclosures made during the year will be provided to the board annually.