
Raising Concerns at Work (Whistleblowing) Policy

Department: Governance & Compliance Directorate

Approved by: Audit and Risk Committee

Author: Compliance, Risk and Assurance Manager

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1 Policy Statement

- 1.1 One Housing Group Limited ('OHGL') and its subsidiaries and affiliates (together the 'Group') are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The aims of this policy are:
- a) to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected,
 - b) To provide staff with guidance as to how to raise those concerns,
 - c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2 Definitions

- 2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- criminal activity;
 - failure to comply with any legal or professional obligation or regulatory requirements;
 - miscarriages of justice;
 - danger to health and safety;
 - damage to the environment;
 - bribery under our Anti-Bribery Policy;
 - financial fraud or mismanagement under our Anti-Fraud Policy;
 - breach of our internal policies and procedures including our Code of Conduct;
 - conduct likely to damage our reputation or financial wellbeing;
 - the deliberate concealment of any of the above matters.
- 2.2 As a member of staff, if you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a '**whistleblowing concern**') you should report it under this policy. The Board, Audit and Risk Committee and the Executive Team take all concerns seriously.
- 2.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the appropriate HR policy and procedure. Your HR Business Partner will be able to give you advice and guidance on this.

3 Scope

- 3.1 This policy applies to all employees (permanent, temporary, fixed term contract) consultants, contractors, agency staff, trainees, apprentices, or any other person associated with the Group including third parties and our subsidiaries. The policy also applies to board members, and committee members including trustees.

4 Raising a Whistleblowing Concern

- 4.1 It is hoped that in many cases a concerned individual will be able to raise any concerns with their line manager. This can be face to face, or by putting the matter in writing if preferred. A line-manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.
- 4.2 However, where the matter is more serious, or it is felt the line manager has not addressed the concern, or it does not feel possible to raise it with them for any reason, you should contact one of the following:
- The Whistleblowing Officer, (Group Director, Governance and Compliance);
 - Your HR Business Partner

Contact details are set out at the end of this policy.

- 4.3 The Whistleblowing Officer / HR Business Partner will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.4 A written summary will be made of your concern. You will be provided with a copy after the meeting. You will also be given an indication of the intended next steps for dealing with the matter.
- 4.5 The Chair of the Audit and Risk Committee Is advised if a whistleblowing issue has been raised

5 Confidentiality

- 5.1 It is hoped that employees will feel able to voice whistleblowing concerns openly under this policy. However, should an employee wish to raise their concern confidentially, every effort will be made to keep their identity secret. If it is necessary for anyone investigating the matter to know the employee's identity, then this will first be discussed with the employee.
- 5.2 Employees are not encouraged to raise concerns anonymously without revealing their identity to anyone appropriate internally. This is because proper investigation may be more difficult or impossible if further information cannot be obtained from the person raising the matter. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed are encouraged to come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to preserve confidentiality. If in any doubt advice is available from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

6 Investigation and Outcome

- 6.1 Once a concern has been raised, an initial assessment will be undertaken to determine the scope of any investigation. The individual raising the issue will be informed of the outcome. There may be a need to attend additional meetings in order to provide further information.
- 6.2 In some cases, an investigator or team of investigators may be appointed including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 6.3 Every effort will be made to keep the whistle-blower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent specific details of the investigation or any disciplinary action taken as a result from being shared. All information about the investigation should be treated as confidential.
- 6.4 If as a result of this investigation, it is concluded that the individual raising concerns has made false allegations maliciously or with a view to personal gain, then they may be subject to disciplinary action.
- 6.5 All investigations and their outcome are reported to the Audit and Risk Committee at their quarterly meetings.

7 If You Are Not Satisfied with the Outcome

- 7.1 While the outcome a Whistle-blower may be seeking cannot be guaranteed, every effort will be made to deal with the concern fairly and in an appropriate way. By using this policy, Whistle-blowers can help us to achieve this.
- 7.2 If unhappy with the way in which their concern has been handled, the concerned individual can raise it with one of the other key contacts in paragraph 4. Alternatively, the Chair of the Audit and Risk Committee may be contact or One Housing's external auditors. Contact details are set out at the end of this policy.

8 External Disclosures

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone external to One Housing.
- 8.2 The law recognises that in some circumstances it may be appropriate for concerns to be reported to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Concerned employees are strongly encouraged to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- 8.3 Whistleblowing concerns usually relate to the conduct of One Housing staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage concerned employees to report such concerns internally first. Line managers or one of the other individuals set out in paragraph 4 can be contacted to provide guidance.

9 Protection and Support for Whistle-blowers

- 9.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. One Housing encourages openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 In law, genuine whistle-blowers will not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes they have suffered any such treatment, they should inform the Whistleblowing Officer immediately. If the matter is not remedied, it should be raised formally using the One Housing Grievance Procedure.
- 9.3 All staff members at all levels within the organisation will not threaten or retaliate against whistle-blowers in any way. Any employee involved in such conduct may be subject to disciplinary action.

10 Contacts

Whistleblowing Officer	Hilary Milne Telephone: 020 821 5395 E-Mail: hmilne@onehousing.co.uk
Chair Audit and Risk Committee	Rommel Pereira E-Mail: rpereira@onehousing.co.uk
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk

11 Monitoring and Review

- 11.1 All instances of whistleblowing, regardless of the outcome of the investigation, are reported to the Audit and Risk Committee.
- 11.2 Should you have any questions or concerns with anything covered within the policy, please speak to your line manager or the Whistleblowing Officer.
- 11.3 This policy will be reviewed every year.