



## Confidential Reporting Policy (Whistle Blowing)

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### Amendments

Changes made	sections	date	by	Date approved by board
Minor – contact details	Page 5 section 5	19/03/2019	L Bell	June 2019

## 1. Introduction

Highstone Housing Association (HHA) is committed to the highest standards of quality, probity, openness and accountability.

As part of that commitment, we encourage employees or others with serious concerns about any aspect of our work to come forward and express those concerns. In many cases, concerns or complaints will be dealt with through our normal procedures, such as the mechanisms for resolving grievances, disciplinary matters or concerns relating to equal opportunities.

However, in some cases, we recognise that employees will need to come forward on a confidential basis. Our staff code and procedures make it clear that they can do so without fear of reprisals or victimisation.

## 2. Whistleblowing

### 2.1 What is a whistleblower?

The term 'whistleblower' is used to describe someone who becomes aware of a serious problem in an organisation and raises the matter so it may be investigated, and if necessary corrected. Sometimes this may involve bringing the problem to wider attention. Usually, the whistleblower will be an employee, but could be someone else, such as a Board member, consultant or volunteer. Some whistleblowers will report a problem to their manager, or someone else more senior within an organisation. Or in other cases they might go to the media, the police, a regulatory body, an MP, or someone with audit responsibilities for the organisation.

In the past many organisations have strongly discouraged whistleblowing. Whistleblowers have been depicted as disloyal and underhand, and have often lost their jobs, or suffered at work, as a result of their actions. The climate of opinion is beginning to change. The Board on Standards in Public Life has stressed the positive role that whistleblowing can play, and the need for improved procedures and practices, which allow people with serious concerns to come forward at an early stage.

The sort of problems covered might include:

- ◆ Financial frauds and malpractice.
- ◆ Other types of corruption.
- ◆ Attempts to cover up earlier problems.
- ◆ Abuse or neglect of vulnerable people.
- ◆ Failure to deliver proper standards of service.
- ◆ Damaging personal conflicts at senior level.
- ◆ Bullying, harassment or victimisation in the workplace.

## 2.2 When is whistleblowing not appropriate?

Whistleblowing procedures should not be used where existing procedures are more appropriate, or where there is no need for special confidentiality.

Nor should whistleblowing be used as a way of protesting against an organisation's legitimate activities or policies of which someone happens to disapprove.

Whistleblowing should be seen as a last resort where other mechanisms do not or could not work. Generally, it will be clear that there is a public interest dimension to genuine whistleblowing.

### 3. Consultation and information

This statement to our employees is intended to underline our commitment to them, and our support for those who come forward to express their concerns.

We will consult and involve you as we develop our procedures and practices on confidential reporting. We will also consult any staff association and recognised trade unions, as well as our normal staff briefing and consultation procedures.

Through our induction and staff briefing procedures, we will make sure that you know how to recognise the following problems, and understand the effect they may have on the HHA, your job and the service you provide:

- ◆ Fraud, corruption and malpractice.
- ◆ Abuse or neglect of vulnerable people.
- ◆ Failure to deliver proper standards of service.
- ◆ Damaging personal conflicts at senior level.
- ◆ Bullying discrimination, harassment or victimisation in the work place.

We will make sure that you know what is expected of you, and what practices we regard as unacceptable. You should discuss anything that seems unclear with your manager. If you are not sure what to do in a given situation, ask before taking any action.

When we find a problem we will always deal with it seriously. We know that we cannot expect you to practice higher standards than those we apply. We will always pursue fraud and serious abuse as vigorously as possible through our disciplinary procedures, or if necessary through the courts. Frauds are also reported to the police. We hope that you will feel confident in coming forward that we will share your sense of right and wrong and act on what you tell us.

#### 4. Confidential reporting

We know that it is never easy to report a concern, particularly one that may relate to fraud or corruption. We urge you to come forward at an early stage and before problems have a chance to become serious. If you prefer, you may come forward with another colleague, friend, trades union representative or other advisor to report a concern.

We will support concerned employees and protect them from reprisals or victimisation. If you come forward with a concern, you can be confident that this will not affect your career or your employment. This applies equally if you come forward in good faith with a concern, which turns out later not to have been justified.

We will do everything necessary to protect your confidentiality, if this is what you have requested.

If anyone tries to discourage you from coming forward to express a concern, we will treat this as a disciplinary offence. In the same way, we will deal severely with anyone who criticises or victimises you after a concern has been expressed.

#### 5. Whom to contact

In most cases you should be able to raise concerns with your line manager. If for some reason this is not possible, you should speak to another senior officer. If necessary you should speak to an Executive Director or senior officer directly, and ask for a confidential meeting. All such contacts will be treated in confidence.

If the HHA's policy and procedures are working properly, you should not need to contact a member of the Board, or some external agency to express concerns. But there may be exceptional or urgent circumstances where it may be best to contact an external agency. It is not possible to give precise examples, but for instance, relevant situations might be:

- ◆ If the problem involved a very senior member of HHA.
- ◆ In the case of a criminal offence, the police.
- ◆ In the case of abuse of vulnerable people in one of our schemes, the appropriate Council's Social Services Registration Officer.
- ◆ In the case of abuse of public funds, the Housing Corporation.
- ◆ In the case of any fraud, HHA's external auditors and/or Homes England and the Tenant Services Authority.

We hope that this will not prove necessary.

You can also approach Public Concern at Work for confidential and independent advice at:

**Address:**

Lincoln's Inn House  
CAN Mezzanine  
7-14 Great Dover street  
London SE1 4YR

**Telephone:**

Protect Advice Line: 020 3117 2520  
Business Support: 020 3117 2525  
General enquiries: 020 3117 2520

**E-mail:**

Protect Advice Line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
Business Support: [business@protect-advice.org.uk](mailto:business@protect-advice.org.uk)  
Media enquiries: [press@protect-advice.org.uk](mailto:press@protect-advice.org.uk)

The Regulator of Social Housing is also able to advise on a confidential basis if you are not sure whom to contact about a problem. As regulators, they may need to follow up on any potential problems identified.

## 6. Dealing with concerns

If you come to us with a concern we will investigate it carefully and thoroughly. We have to be fair to you but also to others involved. If someone is potentially being accused of misconduct, we have to find out their side of the story as well. In our investigation, we will respect any concerns you have expressed about your own safety or career.

If you request we will try and let you know the results of our investigation and about any action that is proposed. However, in doing this, we have to try and respect the confidentiality of other employees as well.

If you have abused the confidential reporting process, for instance by maliciously raising unfounded allegations, we will treat this as a disciplinary matter. But no one who comes forward in good faith has anything to fear.