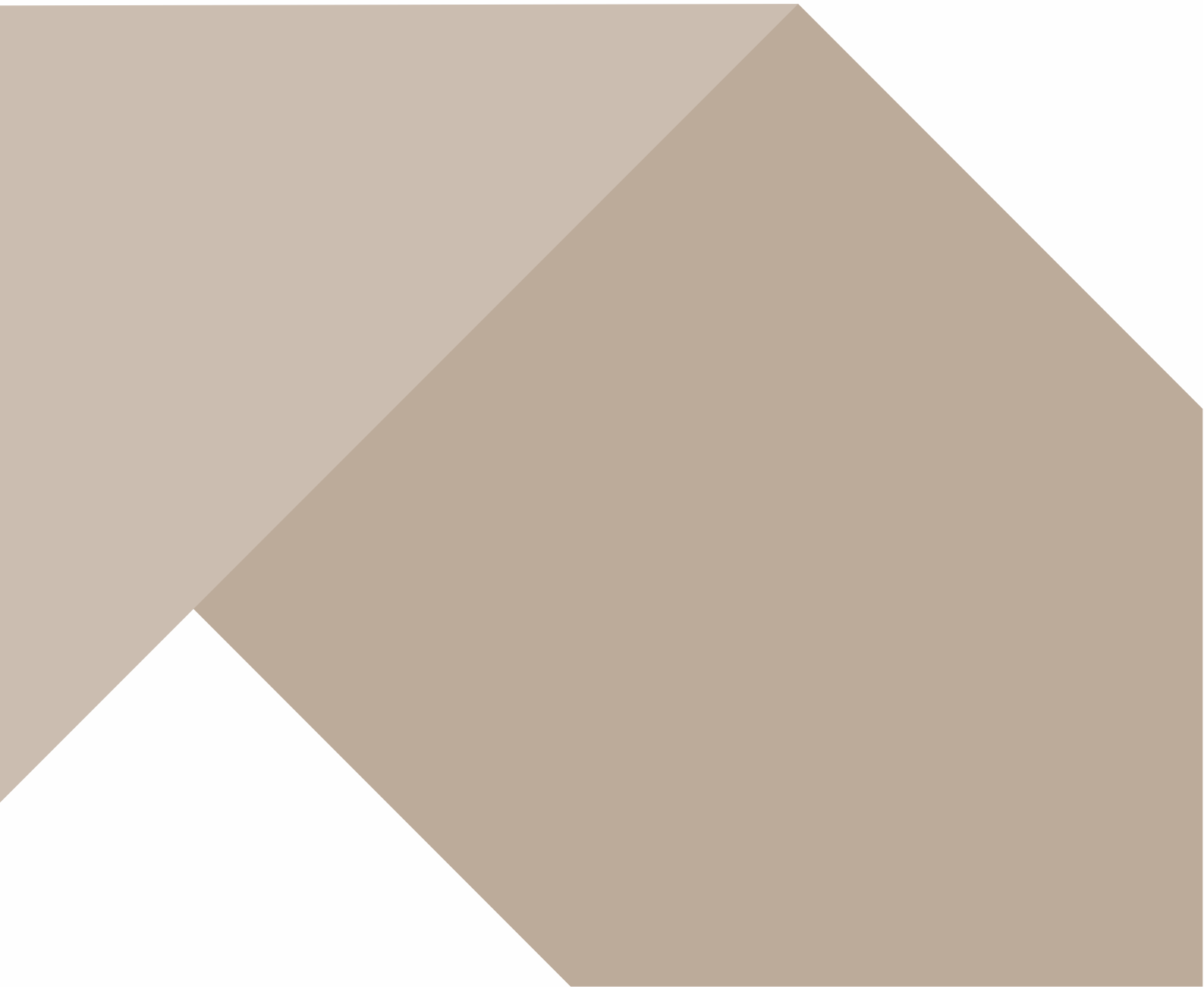


Wheatley Group Whistleblowing Policy

June 2022



We can produce information on request in large print, Braille, tape and on disk. It is also available in other languages. If you need information in any of these formats please contact us on Freephone 0800 479 7979.

如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979。

Si vous nous le demandez, nous pouvons vous remettre ces informations en d'autres langues, en braille ou sur cassette. Si vous souhaitez que ces informations vous soient fournies sous l'un de ces formats, contactez-nous en composant le 0800 479 7979.

چنانچه مایل باشید می‌توانید این مطالب را به فارسی یا زبان‌های دیگر و همچنین بریل و یا بر روی نوار کاست دریافت دارید. در صورت نیاز خواهشمندیم با شماره تلفن 0800 479 7979 با ما تماس بگیرید.

ਜੇ ਤੁਸੀਂ ਸਾਨੂੰ ਬੇਨਤੀ ਕਰੋ ਤਾਂ ਅਸੀਂ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾਵਾਂ, ਬ੍ਰੇਲ (ਨੋੜਹੀਣਾ ਲਈ ਭਾਸ਼ਾ) ਵਿੱਚ, ਜਾਂ ਟੇਪ ਉੱਪਰ ਦੇ ਸਕਦੇ ਹਾਂ। ਜੇ ਤੁਹਾਨੂੰ ਇਨ੍ਹਾਂ ਵਿੱਚੋਂ ਕਿਸੇ ਰੂਪ ਵਿੱਚ ਚਾਹੀਦੀ ਹੋਵੇ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 0800 479 7979 ਨੰਬਰ ਤੇ ਸੰਪਰਕ ਕਰੋ।

Na Pana/Pani życzenie możemy zapewnić te informacje w innych językach, alfabetem Braille'a lub na kasecie. Jeśli chciał(a)by Pan(i) uzyskać te informacje w którejś z tych form, prosimy skontaktować się z nami pod numerem telefonu 0800 479 7979.

Haddii aad na weydiisato waxaanu warbixintan kugu siin karaa iyadoo ku qoran luuqad kale, farta ay dadka indhaha la' akhriyaan ama cajalad ku duuban. Haddii aad jeclaan lahayd in warbixintan lagugu siiyo mid ka mid ah qaababkaas, fadlan nagala soo xidhiidh telefoonka 0800 479 7979.

По вашей просьбе данная информация может быть предоставлена на других языках, шрифтом Брайля или в аудиозаписи. Если вам требуется информация в одном из этих форматов, позвоните нам по номеру 0800 479 7979.

Approval body	Group Audit Committee
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Trade union engagement required	Yes – For consultation
Equality Impact Assessment	No

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1. Introduction

The Wheatley Group and all its subsidiaries ('the Group') are committed to conducting their operations with honesty and integrity and will treat all reports of suspected misconduct seriously.

The Group Whistleblowing Policy is intended to provide an effective means to raise serious concerns they may have about the conduct of others in the Group or how the Group conducts its business.

2. Our aims

Employees are often the first to discover there may be something seriously wrong within their workplace. However, they may not express their concerns because they feel that speaking out would be disloyal to their colleagues, management, or the Group. They may also feel under pressure from harassment or victimisation. In these circumstances, it may feel easier to ignore the concern rather than report what maybe a suspicion of suspected misconduct.

We are committed to the highest possible standards of openness, probity, good practice and accountability and conduct our affairs with honesty and integrity. In line with that commitment, we encourage all employees and others with serious concerns about any aspect of our work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This document makes it clear that staff can raise concerns without fear of reprisals.

This Policy aims to:

- Provide avenues for staff to raise concerns and receive feedback on any action taken;
- Inform staff on how to take the matter further if they are dissatisfied with the response;
- Reassure staff that they will be protected from reprisals or victimisation for whistleblowing where they hold a reasonable belief that the concern is within the public interest; and
- Comply with the Regulatory Standards of Governance and Financial Management set by the Scottish Housing Regulator and the National Care Standards as regulated and inspected by the Care Inspectorate.

3. Policy Scope

This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures. These concerns may include for example:

- Criminal and unlawful activity;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Accounting irregularities;
- Offering or acceptance of bribes;
- Danger to the health or safety of any individual;
- Harassment or discrimination;
- Violations of the Company's Code of Ethics;
- Breach of our Standing Orders, policies or procedures;
- Damage to the environment; or
- Improper or unethical behaviour or conduct.

The above list is not exhaustive. A whistleblower is a person who raises a genuine concern relating to any of the above if they have a genuine belief the matter is in the public interest. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Group activities (a whistleblowing concern) you should report it under this policy.

Guidance on how to raise concerns relating to a staff member's employment or the conduct/behaviour of employees is provided in section 5 of this policy.

4. Safeguards

Harassment or Victimisation

We recognise that the decision to report a concern can be a difficult one to make, not at least because of the fear of reprisal from those responsible for the malpractice. We will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern which they believe to be true.

The whistleblower's employment status will not be affected and the whistleblower will not be disadvantaged if acting in the public interest, even if the concern is unfounded. This does not mean that if a member of staff is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

If staff report a concern but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious allegations, or raise concerns for their own personal gain, disciplinary action will be considered.

Confidentiality

The Group hopes that staff will feel able to voice whistleblowing concerns openly under this Policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

Contact made using the whistleblowing telephone number is completely anonymous, there is no requirement to leave your name or contact details. We will do our best to protect an individual's identity when they raises a concern and does not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence. Where identity must be made public (e.g. for an investigation to continue, for legal proceedings) we will notify the whistleblower.

Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 provides protection for employees who raise genuine concerns about or within the organisation for which they work (including serious issues of wrongdoing, malpractice or unlawful matters). These protections apply to all employees (including full-time and part-time employees, home workers, trainees and agency staff) and it applies whether or not the concerns relate to confidential matters.

The 1998 Act does not apply to volunteers. Accordingly, some of our governing body members fall outside the statutory arrangements relating to Whistleblowing. As matter of policy and good practice, we encourage all governing body members with any concerns about malpractice or wrongdoing to raise these under the terms of this Whistleblowing Policy.

Anonymous Concerns

This Policy encourages staff to put their names to concerns. Concerns expressed anonymously are much less powerful, but they will be considered at our discretion. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the concern from attributable sources.

5. How to raise a Concern

Advice and guidance on how matters of concern may be pursued can be obtained from the Group Assurance Team. All staff can contact the Director of Assurance (ranald.brown@wheatley-group.com) to discuss any concerns.

For minor issues, staff should normally raise concerns with their immediate line manager; unless they is not deemed as being an appropriate first contact or is the subject of the concern. In such instances, a more Senior Manager, Head of Assurance or the Director of Assurance, as the Group Whistleblowing Officer, should be contacted.

For issues relating to an organisational review, concerns should normally be raised as part of the staff consultation.

Issues relating to the conduct and/or behaviour of Group employees that fall outwith those matters outlined in section 3 will be dealt with under the relevant Disciplinary Policy. Concerns of this nature should, in the first instance, be raised with your immediate line manager. If staff wish to raise concerns that relates to their own employment, then they should raise this via the relevant Grievance Policy. It is also possible to obtain independent advice from the Advisory, Conciliation and Arbitration Service (Acas) here: www.acas.org.uk/grievances.

In general, this Whistleblowing Policy is expected to be used for potentially serious and sensitive issues (e.g. corruption, bribery, fraud) and the first step will be to approach the relevant Senior Manager. If that Senior Manager is the subject of the concern, a more Senior Manager or the Director of Assurance should be contacted. If the concern refers to the Group Chief Executive, staff should raise the matter with the Chair of the Group Board. The outcome of any investigations should be reported to the Director of Assurance.

If it is agreed there are grounds for further investigation, the Senior Manager or the Director of Assurance will consult with the relevant Head of Department, Executive Director or Group Chief Executive. Details of the matter being investigated will also be referred to the appropriate body (e.g. the Group Audit Committee, the Subsidiary Board, the Group Board, the Scottish Housing Regulator, the Health and Safety Executive or Care Inspectorate).

Concerns are better raised in writing and the earlier a concern is expressed, the easier it is to take action. The background and history of the concern, including names, dates and places where possible, should be provided along with the reason why the reporting individual is concerned about the situation. Concerns can be reported anonymously in writing by emailing either Ranald.brown@wheatley-group.com or Whistleblowing.Hotline@wheatleyhomes-glasgow.uk.

Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer. Concerns can also be raised anonymously by calling the Group's confidential whistleblowing hotline on **0141 274 6528**. While concerns can be raised anonymously, this may limit the investigation.

Although staff are not expected to prove the truth of a concern and it is not necessary to have absolute proof of improper conduct, they will need to demonstrate that they reasonably believe that the disclosure they are making is in the public interest.

Individuals may invite their Trade Union to raise a matter on their behalf. All staff can raise concerns directly with a prescribed body such as the Scottish Housing Regulator, the Health and Safety Executive or Care Inspectorate. A full list of prescribed bodies is available at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

6. What happens to a raised Concern

The action taken will depend on the nature of the concern. The matters raised may:

- be investigated internally;
- be referred to the police;
- be referred to the External Auditor; or
- be referred to the Scottish Housing Regulator, Health and Safety Executive or the Care Inspectorate.

In order to protect individuals and the Group, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns which fall within the scope of other, existing, procedures (e.g. discrimination issues) will normally be referred for consideration under those procedures.

Some concerns will be resolved by agreed action without the need for investigation.

Within five working days of a concern being received, a representative of the Wheatley Group will write to the person reporting concerns, where the concern has not been raised anonymously:

- acknowledging that the concern has been received;
- telling them whether any initial enquiries have been made; and if not why not; and
- indicating how the matter will be progressed, with an estimate of how long it will take to provide a final response.

The amount of contact between the person considering the issues and the person reporting the concern, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

When any meeting is arranged, the reporting individual has the right, if they so wish, to be accompanied by, for example, an existing member of staff or a Trade Union representative.

We will take steps to minimise any difficulties which the reporting individual may experience as a result of raising a concern. For instance, if the reporting individual is required to give evidence in criminal or disciplinary proceedings, we will advise them about the procedure.

We accept that staff need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, staff will receive information about the outcomes of any investigations.

In order to support staff, and to protect the organisation, it is important that a full audit trail, including proper records, is maintained for all whistleblowing cases. The investigating officer must pass the full audit trail to the Director of Assurance, who is responsible for ensuring that all whistleblowing cases are fully recorded and reported in line with this Policy.

In addition to the case record noted at previous paragraph, a register of all concerns notified to the Group under the Group Whistleblowing Policy will be maintained by the Director of Assurance. The Director of Assurance will be responsible for reviewing the register as part of their independent assessment of the organisation's control framework and will ensure that appropriate follow up and resolution of all cases has been completed.

7. Alternative ways to raise a Concern

This Policy is intended to provide staff with an avenue to raise concerns. If an individual feels it is appropriate to take the matter outside this process, the following are possible contact points:

- the External Auditor;
- the Scottish Housing Regulator, the Health and Safety Executive or Care Inspectorate;
- Trade Unions;
- the individuals' solicitor; or
- the police.

If staff do take the matter outside the Group, they must ensure that they do not disclose confidential information or that disclosure would be privileged.

Professional Advisers

Our auditors (internal and external) and Group legal team are aware of this Policy and our wish to be open and accountable for our actions. They can also be contacted in confidence for advice and as a contact for raising concerns or starting investigations. Contact details are show below.

Professional Advisors	
Name of Organisation	Contact Details
External Auditors, KPMG LLP	319 St Vincent Street, Glasgow, G2 5AS Tel: 0141 226 5511
Assurance, Director of Assurance	Wheatley House, 25 Cochrane Street, Glasgow G1 1HL Tel: 0141 274 6528
Company Secretary, Governance Team	Wheatley House, 25 Cochrane Street, Glasgow G1 1HL Tel: 0141 274 6270
Chief Counsel, Group Legal	Wheatley House, 25 Cochrane Street, Glasgow G1 1HL Tel: 0141 274 6314

We will notify the Scottish Housing Regulator, Health and Safety Executive or Care Inspectorate about all whistleblowing concerns that result in a notifiable event and how we are responding to them. The notification should be made by the Company Secretary, who should also ensure that each case is recorded and monitored.

Contacting the Media

Staff are expected to work within the guidance of this Policy. Contacting the media is not permitted and could result in formal disciplinary action up to and including dismissal.

In line with the Employee Code of Conduct, all contact with the media should be directed through the Communications Department.

Protect

Protect (formerly known as Public Concern at Work) is the whistleblowing charity. Established in 1993, it provides confidential advice to employees, employers and governments. For more information please visit www.protect-advice.org.uk.

8. Responsible Officer

The Group Chief Executive has overall responsibility for the maintenance and operation of this Policy. He will ensure that a record is maintained of concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Group Board.

9. Equal Opportunities Statement

This Policy complies fully with the Group's Equality and Diversity and Human Rights Policy. We recognise our pro-active role in valuing and promoting diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equal treatment for all our stakeholders including tenants and will not discriminate against anyone on the grounds of race, colour, ethnic or national origin, language, religion, belief, age, sex, sexual orientation, gender re-alignment, disability, marital status, pregnancy or maternity. Indeed we will positively endeavour to achieve fair outcomes for all.

We check policies and associated procedures regularly for their equal opportunity implications. We take appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures

10. Legal and Regulatory Framework

This Policy takes account of legal and regulatory requirements. Legislation and regulatory standards relevant to this Policy include:

- Employment Rights Act 1996;
- Public Interest Disclosure Act 1998;
- The Public Interest Disclosure (Prescribed Persons) Order 2014;
- Scottish Housing Regulator – Regulatory Standards of Governance and Financial Management; and
- National Care Standards.

11. Policy Review

This Policy shall be reviewed at least every three years and more frequently where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.

The Group will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages.