



# **WHISTLEBLOWING POLICY**

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# 1. Policy Statement

- 1.1** Eastlight Community Homes (hereafter ‘Eastlight’) is committed to maintaining the highest standards of honesty, openness and accountability, recognising that our success depends on the trust of those we work with.
- 1.2** We encourage everyone 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.
- 1.3** The aim of this Whistleblowing Policy (the ‘Policy’) is to enable and encourage individuals to raise matters of concern that are in the public interest at a high level within the organisation, so that they may be investigated and, where appropriate, acted upon. You will not be at risk of losing your job or suffering any form of retribution as a result of raising a concern about serious malpractice.
- 1.4** This Policy sets out the process for raising a whistleblowing concern and seeks to reassure individuals that it is acceptable and safe for them to raise such concerns without fear of detriment. All disclosures (i.e. the sharing of information relating to potential wrongdoing) will be acted upon promptly, sensitively, fairly and properly, and confidentiality will be respected wherever possible.

# 2. Scope

- 2.1** This Policy applies to all individuals employed by Eastlight and those who are engaged by Eastlight, including apprentices, casual and temporary colleagues, agency workers, self-employed workers, contractors, suppliers and volunteers. The Policy also applies to Board Members and those on Committees.
- 2.2** This Policy is not intended to be used to re-open or review a matter already dealt with under other policies or procedures, or to question or reconsider financial or business decisions taken by Eastlight. The purpose of this Policy is to assist individuals who believe they have discovered serious wrongdoing within the organisation.
- 2.3** This Policy does not form part of a colleague’s contract of employment.
- 2.4** It may be amended at any time.

## 3. Think Customer

- 3.1** At Eastlight, we exist to provide the best possible homes and services for our residents.
- 3.2** Our ‘Think Customer’ approach aims to guide and support colleagues whenever they make decisions that affect our residents, directly or indirectly.
- 3.3** ‘Think Customer’ ensures our people fully consider how residents will experience and be impacted by the service we provide. Before acting, our people are required to think about:
- The short and long-term effects of their actions
  - The residents’ individual needs and preferences
  - Whether their communication is clear, respectful and appropriate
  - If they can draw on any past insights or experiences to help them when making tough decisions
  - Whether they, themselves, would be happy with the service being provided.
- 3.4** The ‘Think Customer’ model is designed to complement and work alongside all Eastlight policies and procedures, including this Whistleblowing Policy.

## 4. What is Whistleblowing?

- 4.1** Whistleblowing is the disclosure of information by an individual associated with Eastlight of suspected wrongdoing or dangers at work. This may include:
- Criminal activity
  - Failure to comply with legal, professional or regulatory obligations
  - Miscarriages of justice
  - Dangers to health and safety
  - Damage to the environment
  - Bribery
  - Financial fraud and mismanagement
  - Collusion
  - Breach of Eastlight’s policies and procedures
  - Conduct likely to damage Eastlight’s reputation or financial wellbeing
  - Unauthorised disclosure of confidential information
  - Negligence
  - Safeguarding concerns, particularly evidence of abuse and exploitation
  - The deliberate concealment of any of the above matters.

- 4.2** A Whistleblower is a person who raises a genuine concern relating to any of the above. If an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of Eastlight’s activities (a whistleblowing concern) it should be reported under this Policy.
- 4.3** It is not necessary to have definitive proof that wrongdoing is, has or will be committed in future. In order to encourage early disclosure, a reasonable belief is enough and will trigger formal protection.
- 4.4** This Policy should not be used for complaints relating to an individual’s personal circumstances, such as the way you have been treated at work. In those cases, Eastlight’s Grievance Policy should be used, if applicable. If you are unsure as to which policy applies, please seek advice from Eastlight’s People Team.

## 5. Disclosure Procedure

### 5.1 Raising a Whistleblowing Concern

- 5.1.1 We hope that in many cases an individual will be able to raise any concerns with their line manager, either in person or in writing. They may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to a Whistleblowing Officer (see Appendix 1).
- 5.1.2 Where the matter is more serious, or the line manager has not addressed the concern, the concern should be raised with a Whistleblowing Officer. If this is not possible for whatever reason, concerns can be raised with a member of the People Team or the Chief Executive.
- 5.1.3 Wherever possible, concerns should be summarised in writing.

### 5.2 Meeting

- 5.2.1 If necessary, Eastlight will arrange a meeting with the individual as soon as possible to discuss their concerns. The individual should make every effort to attend the meeting, and they may ask for the meeting to take place off-site, if preferred.

### 5.3 Investigations & Outcomes

- 5.3.1 In some cases, Eastlight may appoint an investigator or team of investigators, including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. In some cases, an external consultant/organisation may be used.
- 5.3.2 The investigator(s) may make recommendations for change to enable the organisation to minimise the risk of future wrongdoing.

- 5.3.3 Eastlight will, where appropriate, keep the Whistleblower informed of the progress of the investigation and, if possible, its likely timescale. Sometimes, the need for confidentiality or other factors may prevent Eastlight from giving specific details of the investigation, the outcome or any disciplinary action taken as a result. This does not, however, mean that the organisation has not dealt with, or is dealing with, the concern appropriately.
- 5.3.4 If Eastlight concludes that a Whistleblower has made false allegations maliciously, the Whistleblower will be subject to disciplinary action.

## 6. Financial-Related Whistleblowing

- 6.1 In line with Eastlight’s Anti-Fraud Policy, the Executive Director of Finance, as Eastlight’s accountable officer, must report any material adverse event without delay, such as a significant and immediate threat to the organisation’s financial position, significant fraud (defined as fraud of £5,000 or higher) or impropriety, or major accounting breakdown to all of the following:
- Chair of the Group’s Audit & Risk Committee
  - Chair of the Group Board
  - External auditor
  - The Group Chief Executive.

## 7. Anonymous Whistleblowing & Confidentiality

- 7.1 Eastlight hopes that individuals will feel able to voice whistleblowing concerns openly.
- 7.2 Eastlight recognises that sometimes Whistleblowers might want to remain anonymous. In such cases, Whistleblowers should be aware that proper investigation may be more difficult or impossible if Eastlight cannot obtain further information from them. It is also more difficult to establish whether any allegations are credible.
- 7.3 As far as possible, Eastlight will try to keep whistleblowing concerns confidential and only disclose details on a ‘need-to-know basis’. Anyone involved in the process will be told that they must keep the information confidential.
- 7.4 The Whistleblower should also maintain confidentiality, which means they should not discuss their disclosure or Eastlight’s investigation with their colleagues, family or friends without the prior written consent of Eastlight.

## 8. Protection & Support for Whistleblowers

- 8.1** Whistleblowers should 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.
- 8.2** If a Whistleblower believes that they have been subjected to any such treatment, they should inform their line manager or the People team immediately. If the matter is not remedied, it should be raised formally using the Grievance Procedure.
- 8.3** Support can be sought from Eastlight’s Employee Assistance Programme.
- 8.4** An instruction to cover up wrongdoing is a disciplinary offence. If an individual is told not to raise or pursue any concern, even by a senior person in authority, they should immediately report the matter to a Whistleblowing Officer, the Chief Executive, another member of the Executive Management Team or the Senior Independent Director (SID).

## 9. Raising Concerns Externally

- 9.1** The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, Whistleblowers should not find it necessary to alert anyone externally.
- 9.2** The law recognises that in some circumstances it may be appropriate for Whistleblowers to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Eastlight strongly encourages Whistleblowers 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.
- 9.3** Whistleblowing concerns usually relate to the conduct of Eastlight’s 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 a Whistleblower if they raise the matter with the third party directly. However, Eastlight encourages Whistleblowers to report such concerns internally first, in line with this Policy.

## 10. Monitoring & Review

- 10.1** Eastlight is committed to reviewing this Policy regularly to ensure it meets the legal requirements and reflects best practice.
- 10.2** Eastlight will monitor and report on the effectiveness of this Policy to our Audit & Risk Committee annually, including updates on reported incidents, their nature and the outcomes of investigations. Confidentiality and anonymity will be preserved through this reporting.
- 10.3** Eastlight will provide training to colleagues tasked with investigating whistleblowing concerns within our organisation to ensure they handle concerns effectively.

## 11. Equality Impact Assessment

- 11.1** An Equality Impact Assessment (EIA) for this Policy was conducted. As a result, actions have been put in place to mitigate any negative impacts.



# APPENDIX 1 – WHISTLEBLOWING OFFICERS

The designated Whistleblowing Officers are:

<b>Role</b>	<b>Contact</b>
Executive Director of Strategy, Governance & Assurance	<a href="mailto:joanna.barrett@eastlighthomes.co.uk">joanna.barrett@eastlighthomes.co.uk</a>
Executive Director of People & Business Services	<a href="mailto:sharon.ault@eastlighthomes.co.uk">sharon.ault@eastlighthomes.co.uk</a>

In the event that a Whistleblowing Officer is implicated in a concern raised, you should contact the other Whistleblowing Officer. If both officers are implicated, please refer to Section 5.1.2 of the Policy for alternative reporting mechanisms.

Whistleblowing Officers are responsible for:

- Receiving and acknowledging whistleblowing reports
- Ensuring confidentiality is maintained throughout the process
- Assessing and determining the appropriate course of action for each report
- Providing advice and support to individuals raising concerns
- Keeping records of all reports and actions taken.

This Appendix will be updated as and when changes to the Whistleblowing Officers occur.

All communications with the Whistleblowing Officers must adhere to the confidentiality requirements outlined in the Policy.

**Eastlight Community Homes**

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