



# **WHISTLEBLOWING POLICY**

# Contents

Welcome & Thank You for Speaking Up	3
<b>1.</b> Policy Statement	4
<b>2.</b> Scope	4
<b>3.</b> Think Customer	5
<b>4.</b> What is Whistleblowing?	5
<b>5.</b> Disclosure Procedure	6
<b>6.</b> Financial-Related Whistleblowing	8
<b>7.</b> Anonymous Whistleblowing & Confidentiality	9
<b>8.</b> Protection & Support for Whistleblowers	9
<b>9.</b> Raising Concerns Externally	11
<b>10.</b> Monitoring & Review	11
<b>11.</b> Equality Impact Assessment	12
<b>APPENDIX 1: WHISTLEBLOWING OFFICERS &amp; CONTACTS</b>	<b>13</b>

# Welcome & Thank You for Speaking Up

Thank you for taking the time to consider raising a concern and/or making a disclosure. We recognise that speaking up can feel difficult, and you may be unsure about whether what you have seen or heard is serious enough to report.

We would always rather you report a concern than keep it to yourself – when in doubt, it is better to over-report than under-report.

At Eastlight, we want colleagues to feel confident speaking up when something does not feel right. This Whistleblowing Policy explains how to raise concerns about suspected wrongdoing safely and appropriately, so issues can be addressed early, and we can protect our colleagues, services and reputation.

We will take every concern seriously, handle disclosures promptly and sensitively, and will not tolerate victimisation or any other detriment for raising a genuine concern in good faith.

Our contact details are below and in the appendix. Please do reach out – we want to hear from you.

Kind regards,

**Jo Barrett**

Whistleblowing Officer

Chief Strategy, Governance & Assurance Officer

[joanna.barrett@eastlighthomes.co.uk](mailto:joanna.barrett@eastlighthomes.co.uk)

**Sharon Ault**

Whistleblowing Officer

Chief People Officer

[sharon.ault@eastlighthomes.co.uk](mailto:sharon.ault@eastlighthomes.co.uk)

# 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. However, all organisations face the risk of things going wrong from time to time or unknowingly harbouring illegal or unethical conduct.
- 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 wherever possible.
- 1.3 The aim of this Whistleblowing Policy (the ‘Policy’) is to enable and encourage individuals to raise concerns about suspected wrongdoing as soon as possible 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 detriment as a result of raising a concern about suspected wrongdoing.
- 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 and Committee Members.
- 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 and may be amended at any time. **If you require this Policy in a different format, please let us know.**

## 3. Think Customer

- 3.1** At Eastlight, we exist to provide the best possible homes and services for 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 must 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 but is not limited to:
- 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
  - Sexual harassment (witnessing or experiencing)
  - 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. 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 which do not or could not affect more than the individual concerned, such as the way they have been treated at work. In those cases, Eastlight’s Grievance Policy should be used, if applicable.
- 4.5** If a complaint relates to an individual's own personal circumstances but they also have concerns regarding one of the areas set out in 4.1 above, the individual should discuss it with a Whistleblowing Officer or, if they feel it more appropriate for the concern, with the Chair of the Audit & Risk Committee (ARC) or the Internal Auditors (see Appendix 1) (e.g. you may prefer to raise a financial mismanagement concern with the Chair of ARC or an auditor).
- 4.6** If you are unsure which policy applies, or whom to raise your concern to, please seek advice from your line manager, or a Whistleblowing Officer (listed in Appendix 1).

## 5. Disclosure Procedure

### 5.1 Raising a Whistleblowing Concern

5.1.1 If you are unsure where to start, use the options below and choose the route you feel most comfortable with (see Appendix 1 for contact details where listed).

5.1.2 **Who should I speak to?** (Read the quick guide below):

- If your concern is about day-to-day working practices or can be resolved locally: raise it with your **Line Manager**
- If your concern involves your line manager, or you do not feel able to raise it with them: contact a **Whistleblowing Officer**
- If your concern relates to senior leaders, Board members, or you believe it needs independent oversight: contact the **Chair of the Audit & Risk Committee (ARC)** or the **Internal Auditor**
- If you believe you have been asked to cover up wrongdoing or told not to raise a concern: report immediately to a **Whistleblowing Officer**, another member of the **Executive Management Team**, or the **Chair of ARC**.
- If you want confidential independent advice before you raise a concern (or if

you remain unhappy after using internal routes): contact the Whistleblowing Charity, **Protect** (see Appendix 1).

- 5.1.3 Concerns can be raised in writing via letter or email or verbally by telephone or in person.
- 5.1.4 We hope that in many cases an individual will be able to raise any concerns with the line manager. They may be able to agree a way of resolving the concern quickly and effectively.
- 5.1.5 Where the matter is more serious and/or cannot be appropriately raised through the line manager, the concern should be raised with one of the following: a Whistleblowing Officer, the Chair of the Audit & Risk Committee, or the Internal Auditor (see Appendix 1).
- 5.1.6 Wherever possible, concerns should be summarised in writing by the person raising the concern. If this is not possible, the Whistleblowing contact will take detailed notes of the concern during a verbal conversation and confirm with the individual it is accurate before acting.

## **5.2 Meeting**

- 5.2.1 Eastlight's actions will depend on the concerns raised, but generally, it will involve the following:
  - Arranging 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
  - Making a written summary of the individual's concern and providing them with a copy of this after the meeting, along with an indication of how the concern(s) raised will be dealt with
  - Individuals may be accompanied by a companion to this meeting and any other meetings under this Policy. As per ACAS guidance, a companion could be a work colleague, trade union representative or trade union official. Any companions must respect the confidentiality of the disclosure and any subsequent investigation
  - The Whistleblowing Officer may appoint an investigating officer, if necessary, in line with the process outlined in the fraud response plan.

## **5.3 Investigations**

- 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 or vexatiously, the Whistleblower will be subject to disciplinary action where appropriate.
- 5.3.5 An investigation file will be kept in a secure location for each whistleblowing concern raised, including an outcome report. This will include the decision and the reason the decision was reached.

#### **5.4 Outcomes**

- 5.4.1 If a Whistleblower is not happy with the way in which a concern has been handled, they may raise it with the Internal Auditor or the Chair of the Audit & Risk Committee (if they were not the original Whistleblowing Officer) or the Charity Protect (a Whistleblowing Chairty) (see Appendix 1).

## **6. Financial-Related Whistleblowing**

- 6.1 Concerns relating to fraud, financial impropriety or major financial control failures are a specific form of whistleblowing and are therefore covered by this Policy. While Eastlight's Anti-Fraud Policy sets out detailed arrangements for preventing, detecting and responding to fraud, this Policy explains how individuals can safely raise financial-related concerns, the protections available to them, and how such concerns will be escalated and reported where required.
- 6.2 In line with Eastlight's Anti-Fraud Policy, the Chief Finance Officer, 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 Audit & Risk Committee
  - Chair of the Board
  - External auditor
  - The Chief Executive Officer.

## 7. Anonymous Whistleblowing & Confidentiality

- 7.1** Eastlight hopes that individuals will feel able to voice whistleblowing concerns openly. However, should an individual want to raise a concern confidentially, Eastlight will make every effort to keep their identity a secret. If it is necessary for anyone investigating a concern to know of the Whistleblower's identity, this will be discussed with the Whistleblower concerned.
- 7.2** Eastlight does not encourage individuals to make disclosures anonymously, although Eastlight will make every effort to investigate anonymous disclosures. 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** Individuals may contact the independent whistleblowing charity Protect for confidential advice and support, including advice on how to raise concerns anonymously or externally where appropriate.
- 7.4** If individuals wish to make an anonymous disclosure, they can do so by telephone by withholding their number, by letter or by a non-identifiable email created for the purpose.

## 8. Protection & Support for Whistleblowers

- 8.1** It is understandable that Whistleblowers are sometimes worried about possible repercussions. Eastlight aims to encourage openness and will support individuals, where their identity is known, who raise genuine concerns under this Policy, even if after investigation, their concerns are not substantiated.
- 8.2 What support is available?**
- 8.2.1** Eastlight recognises that raising a concern can be difficult. Where an individual's identity is known, we will agree a preferred way to keep in touch and will provide the following support where appropriate:
- **Named point of contact:** a Whistleblowing Officer (or delegated investigating officer) will be your main contact and will explain the next steps
  - **Being heard and supported:** you may bring a companion to meetings (see

5.2.1). We can also agree practical arrangements to reduce stress (for example, meeting location, timings or communication methods)

- **Updates:** we will acknowledge receipt and provide updates on progress as the matter is handled. We may not be able to share full details where this would breach confidentiality, data protection, legal privilege or would prejudice an investigation
- **Confidentiality:** information will be shared only on a need-to-know basis. If it becomes necessary to disclose your identity to progress an investigation, this will be discussed with you in advance wherever possible
- **Protection from detriment:** if you believe you are being treated unfairly because you raised a concern, tell your line manager or the People Team as soon as possible so this can be addressed
- **Wellbeing support (staff):** you can access Eastlight’s Employee Assistance Programme and/or speak with the People Team for support and advice. Trade union representatives may also provide support if applicable
- **Independent advice:** individuals can also seek confidential independent advice from Protect (see Section 9 and Appendix 1). Protect can advise on options, including when and how to approach an appropriate prescribed regulator, where applicable.

- 8.3** Whistleblowers should not suffer any detrimental treatment or reprisal as a result of raising a concern in good faith. Detrimental treatment could include dismissal, disciplinary action, threats, negative attitudes from staff, or other unfavourable treatment connected with raising that concern.
- 8.4** If a Whistleblower believes that they have been subjected to any such detrimental treatment because of their whistleblowing, 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 Policy and Procedure. Support for staff can also be sought from Eastlight’s Employee Assistance Programme, details of which can be found on Eastlight’s intranet.
- 8.5** Individuals should not subject Whistleblowers to any detrimental treatment because of their whistleblowing concern. Individuals involved in such conduct may be subject to disciplinary action.
- 8.6** Eastlight is committed to conducting business with integrity, honesty and transparency. 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 either a Whistleblowing Officer, the Chief Executive, or another member of the Executive Management Team. An instruction to cover up wrongdoing is a disciplinary offence and will be treated as such.

## 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.
- 9.3** 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.
- 9.4** Where a concern is about an area regulated by an external body, you may be able to make a protected disclosure to a prescribed person/regulator. We encourage you to seek advice first (for example, from the Whistleblowing Charity, Protect) to help you identify the appropriate regulator and understand any information requirements, and to consider whether the concern can be resolved through Eastlight’s internal routes.

## 10. Monitoring & Review

- 10.1** Eastlight is committed to reviewing this Policy regularly to ensure it meets the legal requirements, reflects best practice and monitor impacts including detriment and wellbeing.
- 10.2** A review of the Policy will be undertaken after each investigation to ensure that the Policy is reflective of practice.
- 10.3** 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. The reporting will include any identified negative impacts due to process which have already been rectified.
- 10.4** 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 & CONTACTS

## The designated Whistleblowing Officers are:

Role	Contact
Chief Strategy, Governance & Assurance Officer	<a href="mailto:joanna.barrett@eastlighthomes.co.uk">joanna.barrett@eastlighthomes.co.uk</a>
Chief People Officer	<a href="mailto:sharon.ault@eastlighthomes.co.uk">sharon.ault@eastlighthomes.co.uk</a>

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.

Serious concerns include, but are not limited to:

- Complaints about a Chief Executive, a member of the Leadership Team or member of the Board
- Theft, corruption or fraud (e.g., dishonest or fraudulent conduct relating to payments or falsifying documents)
- Criminal offences and breaches of civil law
- Endangerment to the health and safety of any person.

## Choosing the right contact:

If your concern involves (or may implicate) one of Whistleblowing Officers, or you do not feel able to raise a concern with the officer names above, then concerns may also be raised with:

Role	Contact
Chair of Audit & Risk Committee	<a href="mailto:simon.jones@eastlighthomes.co.uk">simon.jones@eastlighthomes.co.uk</a>
Internal Auditor	<a href="mailto:suzanne.rowlett@rsmuk.com">suzanne.rowlett@rsmuk.com</a>
Protect Advice Line (external charity)	020 3117 2520 <a href="#">Email Advice Line - Protect</a>

## For financial-related disclosures, you can also contact:

Role	Contact
Chief Executive	<a href="mailto:emma.palmer@eastlighthomes.co.uk">emma.palmer@eastlighthomes.co.uk</a>
External Auditor	George Shillam, Partner, Menzies <a href="mailto:gshillam@menzies.co.uk">gshillam@menzies.co.uk</a>

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

This page will be updated as and when changes to the Whistleblowing Officers occur or contact details for internal audit change.

**Eastlight Community Homes**

Eastlight House, Charter Way

Braintree

Essex

CM77 8FG

**0330 128 0330**

[www.eastlighthomes.co.uk](http://www.eastlighthomes.co.uk)

[customer.services@](mailto:customer.services@eastlighthomes.co.uk)

[eastlighthomes.co.uk](http://eastlighthomes.co.uk)

 [eastlighthomes](https://www.facebook.com/eastlighthomes)

 [eastlighthomes](https://www.instagram.com/eastlighthomes)

 [@eastlighthomes](https://twitter.com/eastlighthomes)

 [eastlight-community-homes-](https://www.linkedin.com/company/eastlight-community-homes/)