

## WHISTLEBLOWING POLICY

### **1. Purpose**

This Policy is intended to help staff, volunteers and contractors of Black Country Housing Group who have concerns over any wrong-doing within the Group relating to unlawful conduct, financial malpractice or dangers to the public or to the environment. The procedure details how staff can raise their concerns appropriately and be supported and protected to do so.

Black Country Housing Group is committed to the highest standards of quality, probity, openness and accountability. As part of that commitment, the Group encourages staff or others with concerns about any aspects of its work to come forward and express those concerns without fear of reprisals.

### **If in doubt – raise it!**

This Policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon their concerns
- Provide ways for staff to raise their concerns and receive feedback on any action taken as a result. See the [Whistleblowing Procedure](#) for details
- Ensure that, where appropriate, staff get a response to their concerns and are aware of how to follow up on these if they remain unsatisfied
- Reassure staff that if they raise any concerns in the public interest, and reasonably believe them to be true, they will be protected from possible reprisals, victimisation or retribution from any member of staff

### **2. Scope**

All staff may use this Policy. This includes permanent, temporary and casual staff and volunteers as well as agency staff and staff seconded to a third party. Any concerns relating to the third party, if relevant to the staff member's secondment, can also be raised under this Policy.

Contractors working for the Group (including employees working in any partnerships or joint venture arrangements, or those participating in partner or joint venture bodies on behalf of the Group) may also use the provisions of this Policy to make the Group aware of any concerns that the contractor's staff may have with regard to any contractual or other arrangement with the Group. The private concerns of the contractor, partner or joint venture body relating to non-BCHG

business should be raised with the relevant contractor and/or other suitable agency/regulator – including the police if appropriate.

This Policy is designed to deal primarily with concerns raised in the public interest; matters affecting the individual should be addressed through the Group's Grievance Procedure.

BCHG or 'The Group' is used through this Policy and refers to all departments and Companies of BCHG including but not limited to Black Country Homeforce, Black Country Care Services, e<sup>2</sup>S Consultancy and BCS Associates.

All those to whom this Policy applies, as detailed above, are referred to throughout this document as 'staff', for ease of reference.

### **3. Related or relevant policy/procedures or other documents**

- Whistleblowing Procedure
- Code of Conduct
- Probity Policy
- Equal Opportunities Policy
- Grievance Procedure
- Disciplinary Policy & Procedure
- Fraud Response Policy
- Harassment Procedure
- Finance Policy
- Safeguarding Vulnerable Adults Policy & Procedure

### **4. Definitions**

The Policy specifically relates to **The Public Interest Disclosure Act 1998** (otherwise known as PIDA OR 'the Whistleblower Act'), amended by the Enterprise and Regulatory Reform Act 2013. The Act protects all staff against detrimental treatment or dismissal as a result of any disclosure of normally confidential information in the interests of the public. **The Act only covers protected disclosures under six categories, namely;**

- Crime
- Illegality
- Miscarriage of justice
- Damage to health and safety
- Damage to the environment
- And 'cover-ups' about these issues.

Specific Examples could include;

- A criminal offence (e.g. fraud, corruption or theft) has been/is likely to be committed
- A miscarriage of justice has occurred/is likely to occur
- The health or safety of any individual has been/is likely to be endangered
- The environment has been/is likely to be damaged
- Public funds are being used without authorisation
- Sexual or physical abuse of any member of staff or service recipient is taking place

- Discrimination is occurring to any member of staff or service recipient
- Any other form of improper action or conduct is taking place
- Information relating to any of the above is being deliberately concealed or attempts are being made to conceal the same.

## 5. Responsibilities

- Overall responsibility for the implementation of the Policy is with every individual
- Implementation will be by all members of staff and contractors where applicable.
- It is every manager's responsibility to ensure that all staff and contractors are aware of this Policy and its implications.

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|---------------|--------------------------|---------------------|------------------------|
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