



LONDON HOMES
SINCE 1926

WHISTLEBLOWING PROCEDURE

Approver	Board of Management
Policy	Whistleblowing
Date Last Revised Date	May 2015
Revised by	Executive Director - HR
Related Documents	Confidential Reporting Policy, Anti-Fraud and Theft Policy, Anti Money Laundering Policy, Disciplinary Policy, Employee Code of Conduct, Grievance Policy, Health and Safety Policy, Safeguarding Vulnerable Adults Policy and Procedure, Dignity at Work Policy; Customer Feedback Procedure
Location of Hard Copy	HR Department

Signed:

Caroline Tiller
C&C Chief Executive



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CONFIDENTIAL REPORTING

WHISTLEBLOWING PROCEDURE

1. HOW TO RAISE CONCERNS

- 1.1 As a first step, staff should normally raise concerns with their immediate manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, in cases where a line manager is implicated, it may be necessary to refer the matter to someone outside the direct reporting line.
- 1.2 Concerns are better raised in writing. Staff are encouraged to set out the background and history of the concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. If for any reason, the member of staff does not feel able to put their concern in writing, they can telephone or meet the appropriate officer. The earlier a concern is raised, the easier it is to take action.
- 1.3 Although a Whistleblower is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for their concern.
- 1.4 Advice and guidance on how matters of concern may be pursued can be obtained from the Human Resources Department.
- 1.5 In order to provide additional support to a Whistleblower, they may choose to come forward with another colleague, a friend, trade union representative or other advisor to report a concern.

2. WHOM TO CONTACT

- 2.1 In most cases, a Whistleblower should be able to raise any concerns with their line manager. If for some reason this is not possible, the staff member should speak to another senior officer, the Executive Director - Human Resources or the Chief Executive. All such contacts will be treated in confidence. If C&C's policy and procedures are working properly, the Whistleblower should not need to contact one of C&C's Board of Management Members or an external agency to express concerns. But there may be exceptional or urgent circumstances where it might be best to contact an external agency. It is not possible to give precise examples but, for instance, relevant situations might be:

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- if the problem involved very senior staff of the organisation, the chair or another committee member.
- in the case of a criminal offence, the police.
- in the case of abuse of vulnerable people in a residential home, the local authority social services safeguarding officer.
- in the case of abuse of public funds, the Homes and Communities Agency which is responsible for regulating all registered social landlords.
- in the case of any fraud, C&C's external auditors and /or the Homes and Communities Agency.

For confidential and independent advice any member of staff can also approach Public Concern at Work:

Address

3rd Floor, Bank Chambers
6 - 10 Borough High Street
London SE1 9QQ

Telephone

Whistleblowing Advice Line: 020 7404 6609
General enquiries: 020 3117 2520

Fax

020 74038823

Email

UK advice line: whistle@pcaw.org.uk

We hope that none of these will ever prove necessary.

- 2.2 Where a member of staff raises a matter externally which should have been referred internally in the first instance (i.e. matters which are not exceptional or urgent), C&C reserves the right to question whether the disclosure was made in good faith.
- 2.3 Performance Audit staff in the relevant regional office of the Homes and Communities Agency are also able to advise on a confidential basis if an employee is not sure whom to contact about a particular problem. As regulators, they may need to follow up on any potential problems identified.

3. HOW C&C WILL RESPOND

3.1 The action taken by C&C 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;
- form the subject of an independent inquiry.

3.2 In order to protect individuals and C&C, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, protection of vulnerable adult or discrimination issues) will normally be referred for consideration under those procedures.

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

3.4 Within ten working days of a concern being received, management will write to the Whistleblower (where their name and contact details are disclosed):

- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- advising on whether any initial enquiries have been made;
- advising on whether further investigations will take place, and if not, why not.

3.5 The amount of contact between the officers considering the issues and the Whistleblower 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 from the member of staff.

3.6 When any meeting is arranged, the member of staff will have the right, if they so wish, to be accompanied by a work colleague, Trade Union representative or a member of the JSC who is not involved in the area of work to which the concern relates.

3.7 C&C will take steps to minimise any difficulties that may be experienced as a result of raising a concern. For instance, if required to give evidence in



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criminal or disciplinary proceedings, the member of staff will be advised about the procedure.

- 3.8 C&C accepts that staff will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive information about the outcomes of any investigations.

9. RESPONSIBLE OFFICER

The Executive Director - Human Resources has overall responsibility for the maintenance and operation of this procedure. The HR Department maintains a record of concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Chief Executive and the Board as appropriate.

10. REVIEW

- 10.1 The practical operation of this procedure will be reviewed every three years or more regularly, if required.