

WHISTLEBLOWING POLICY

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Executive Summary:
Whistleblowing is a way for individuals to raise a concern about anything that they think isn't quite right. In most instances individuals will feel comfortable raising concerns with their manager, or with their usual contact at RBH if a customer or one of our partners. Where this isn't the case there are a number of other routes individuals can take to ensure their concerns are addressed. The Whistleblowing Policy gives guidance on the routes that are available and how individuals should go about doing this.

Policy Grouping/Directorate	Governance	
Owner Name / Job Title	Marcus Roe / Director of Governance	
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EIA Completed	Yes ☒	No ☐
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Notes:		

1 Introduction and Aims

- 1.1 Rochdale Boroughwide Housing (RBH) is committed to the highest possible standards of openness, probity and accountability and encourage freedom to speak up. It is therefore expected that colleagues or any third parties who have serious concerns about any aspects of our work should come forward and voice those concerns.
- 1.2 This policy applies to all colleagues (permanent and temporary colleagues), consultants, contractors, agency colleagues, trainees, apprentices, or any other person associated with RBH including third parties and our subsidiaries. The policy also applies to board members and committee members.
- 1.3 The aims of the policy are:
- To enable colleagues, customers, members of the public and any other individual 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.
 - To provide reassurance that genuine concerns can be raised with RBH without fear of reprisals, even if they turn out to be mistaken.

2 Context

- 2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law protects workers from being retaliated against by their employer if they make a 'protected' disclosure.
- 2.2 The Public Interest Disclosure Act 1998 sets out the circumstances in which a disclosure of specific categories of wrongdoing or malpractice will be protected. The person(s) raising a concern must have a reasonable belief that the wrongdoing has taken place in the past, is continuing or is likely to happen in the future.
- 2.3 The policy maintains compliance with:
- Public Interest Disclosure Act (1998)
 - Employment Rights Act (1996)
 - Enterprise and Regulatory Reform Act (2013)
 - Follows ACAS guidance in relation to Whistleblowing at work
- 2.4 This policy enables RBH colleagues, customers and members of the public to speak up if there are any issues they have encountered at RBH.

2.4 Economic Standards

[Governance & Financial Viability Standard](#)

Whistleblowing enables good governance by providing a channel through which concerns can be raised.

[Value for Money Standard](#)

Where VfM is not being followed, whistleblowing allows all RBH colleagues and members of the RBH community to highlight this.

Consumer Standards

Neighbourhood & Community Standard

Whistleblowing is for not just RBH colleagues, but also customers and members of the public. This means that where RBH may not be meeting a community standard, everyone can bring this to the attention of RBH's leadership.

Safety & Quality Standard

Ensuring RBH colleague and customer safety is paramount. Whistleblowing adds an extra layer of assurance against RBH's efforts to ensure this through allowing people to bring anything substandard to light.

Transparency, Influence & Accountability Standard

RBH will report all the whistleblowing reports to the appropriate bodies for scrutiny, including the Audit and Risk Committee where the non-executive directors can review what has been raised and how the concerns have been addressed. This ensures transparency and accountability for all areas of RBH.

3 Values

3.1 The policy fits with the mutual values of RBH:

Putting People First: We listen with empathy, respond with compassion, and make it easy for our customers to access our services.

This policy ensures that customers have a method through which they can express concerns and puts in place measures to protect those customers and colleagues.

Doing What We Say: We earn trust through honesty, integrity, caring and keeping our promises.

Following through on whistleblowing reports demonstrates RBH will do what it says. This policy has a section on how RBH will respond to whistleblowing reports.

Open & Transparent: We are curious, embrace diverse ways of thinking and seek feedback to help us improve.

This policy ensures that feedback to whistleblowers on their reports will be made, ensuring the process is transparent and accountable. This policy also requires all whistleblowing reports get reported to Audit and Risk Committee.

Delivering Quality: We invest wisely in our people and make it easy for them to deliver services and create places that our customers are proud to call home.

This policy lays out the foundations for a modern Whistleblowing process which will enable assurance against services and the identification of issues and fraud.

Working as One: We embrace our mutuality and work together to deliver great outcomes for the people living in our homes and communities.

An effective whistleblowing approach promotes trust between colleagues facilitating collaborative working.

4 Whistleblowing Safeguards

- 4.1 When an individual makes a whistleblowing report they are protected from detrimental treatment or unfair dismissal by law. Raising a whistleblowing concern is known in law as a making a 'protected disclosure'.

Colleagues who make a protected disclosure and believe that RBH has failed to protect them are able to seek assistance from the Advisory, Conciliation and Arbitration Service (ACAS), or from the charity Protect.

4.2 Harassment or victimisation

It is recognised that the decision to report a concern can be a difficult one to make. RBH will not tolerate any harassment or victimisation (including informal pressures) of a person, or persons expressing a concern and will take appropriate action to protect an individual when they raise a concern in good faith.

Any investigation into allegations of potential unacceptable behaviour or practice will not influence or be influenced by any disciplinary or redundancy procedures that already affect colleagues/others covered by this policy.

4.3 Confidentiality

All concerns will be treated in confidence, and every effort will be made not to reveal the identity of the whistleblower if they so wish. If it is necessary for anyone investigating the matter to know their identity, then this will first be discussed with the whistleblower.

4.4 Anonymous allegations

This policy encourages those reporting an issue to put their names to their allegations whenever possible. Concerns expressed anonymously are much less powerful and can be more difficult to investigate as we may want to liaise with those making a report to obtain further information. We are also unable to offer support to anonymous whistle-blowers.

RBH will treat anonymous allegations in the same way as any other allegations.

4.5 Untrue allegations

If colleagues make allegations in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, colleagues make allegations frivolously, maliciously or for personal gain, disciplinary or other action may be taken against them.

5 What Whistleblowing is at RBH

5.1 What types of issues can be raised?

Colleagues can make protected disclosures relating to the following concerns:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Sexual harassment (unwanted conduct of a sexual nature, as defined in the Equality Act 2010)

- Environmental damage
- Concealing any information relating to the above.

Colleagues and customers are however encouraged to report anything they identify as wrongdoing and RBH will treat those disclosures in the same manner as protected disclosures.

Those disclosures may include:

- Unauthorised use of RBH resources.
- Any danger to health and safety.
- Fraud.
- Bribery
- Failure to follow or abide by policy particularly where this could result in safety or financial loss.
- Corruption.
- All forms of harassment, victimisation or bullying.
- Misuse of drugs and/or alcohol.
- Breach of our internal policies and procedures including our Code of Conduct. a code of practice or any law or regulation.
- A person failing to meet appropriate professional standards.
- A person being discriminated against because of their race, colour, religion, ethnic or national origin, disability, age, sex, sexual orientation.
- Instances or suspicions of modern-day slavery or human trafficking in any aspect of our business.
- Attempts to conceal or hide any information relating to any of the above.

All acts being reported may be in the past, present or future.

Concerns may be about a colleague, people who work directly for RBH, suppliers, people who provide services on our behalf or the people who live in RBH properties.

If a colleague has any genuine concerns related to suspected wrongdoing or danger affecting any of activities (a 'whistleblowing concern') they should report it under this policy.

5.2 **What is not covered?**

The Whistle-blowing Policy does not cover matters that are covered by other policies and procedures, including:

- Colleagues' complaints about their employment. These are dealt with through the Grievance Procedure.
- Customer complaints about our services which will be dealt with via our complaints process.
- Contract disputes which will be dealt with under the contract resolution clause in the contract.

6 How to Raise a Concern

- 6.1 As a first step, colleagues should normally raise concerns with their immediate manager.

This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. You can also report your concerns in the following ways:

- By contacting the Risk and Compliance Manager.
- By contacting any RBH Director.
- By contacting any member of RBH's Executive Leadership Team.
- By contacting the Chair of Audit and Risk Committee.
- Through the dedicated whistleblowing email address.
- Concerns can also be raised via the RBH website - www.rbh.org.uk/about-us/governance/whistleblowing/ This can be done anonymously though as mentioned at 6.3 we do encourage people to provide contact details wherever possible.

Each channel identified will ensure that the Whistleblowing report is dealt with appropriately according to RBH's set processes.

- 6.2 Concerns may be raised verbally or in writing, providing the following information:
- The background and history of the concerns (giving relevant dates whenever possible).
 - The reasons why they are particularly concerned about the situation.
- 6.3 Colleagues (and others covered by this policy) should express their concerns as early as possible as it may then be easier to take action.
- 6.4 Although colleagues (and others covered by this policy) are not expected to prove the truth of allegations, they will need to demonstrate to the person contacted that there are reasonable grounds for their concerns.
- 6.5 Colleagues may invite their trade union or workplace colleague to be present during any meetings or interviews in connection the concerns they have raised.

7 How will RBH respond?

- 7.1 RBH will respond to all concerns raised where possible.

Once a concern has been raised, an initial assessment will be undertaken to determine the scope of any investigation. The individual raising the issue will be informed of the outcome of the initial assessment.

Every effort will be made to keep the whistle-blower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent specific details of the investigation or any disciplinary action taken as a result from being shared.

Those raising a concern should remember that testing out their concerns is not the same as either accepting or rejecting them.

- 7.2 Within ten working days of concerns being raised, the colleague who received the whistleblowing report will write to the whistle blower:
- Acknowledging that the concerns have been received.
 - Indicating how it is proposed to deal with the matters raised.
 - Giving an estimate of how long it will take to provide a final response.
 - Indicating whether any initial enquiries have been made.

- Supplying information on support mechanisms where appropriate, and indicating whether further investigations will take place and, if not, why not
- 7.3 If it is not possible or inappropriate for the colleague who received the whistleblowing report to write to the whistleblower one of the following will write in their stead; Chief Executive, appropriate Executive Director, Chair of the Audit and Risk Committee, Director of Governance.
- 7.4 The level of contact between the officer considering the issues and the individual raising the concern will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided.
- 7.5 Concerns or allegations which fall within the scope of documented RBH procedures defined through policy or operationally by teams will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 7.6 All whistleblowing reports will be reported to the Audit and Risk Committee regardless of the outcome at the point they are lodged as well as during the investigation through to conclusion. For the avoidance of doubt, the name of the person raising the concern will not be shared.
- 7.7 If a whistleblowing report contains allegations of a criminal nature and it is proportionate, RBH will involve the police or relevant authority.

8 How Matters of Concern can be Taken Further

- 8.1 This Policy is intended to provide colleagues and others with an avenue to raise concerns within RBH and will be satisfied with the outcome. However, if colleagues (and others covered by this policy) feel that matters of concern have not been dealt with satisfactorily, the following are possible contacts if they wish to take the matters further:
- RBH's Chair of the Board, Chair of Audit Committee, or non-executive directors.
 - Our internal auditors.
 - Protect – Free confidential advice for whistle blowers. www.protect-advice.org.uk 0203 1172520.
 - Police or other relevant authority.
- 8.2 If colleagues take matters outside RBH, it will be necessary to ensure that they do not disclose confidential or legally privileged information as this may result in disciplinary action being taken.

9 Training and Awareness

- 9.1 All colleagues will be given training in relation to whistleblowing upon induction and at least once every three years thereafter.
- 9.2 RBH will run awareness campaigns for the whistleblowing channel to ensure colleagues and customers are aware of what it is and how to use it. This may

involve including promoting whistleblowing under a different moniker to promote engagement.

- 9.3 RBH will maintain channel for concerns called “Speak Up” which supplements the current whistleblowing channel. The intent of this channel is to promote engagement with whistleblowing by providing a way for colleagues to raise issues that avoids the stigma that can be attached to making a whistleblowing report.

10 Monitoring

- 10.1 All allegations that are received under this policy will be reported to the Audit and Risk Committee which will maintain oversight of the case and any actions that arise.

11 Review

- 11.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are ‘fit for purpose’ and comply with all relevant legislation and statutory regulations.
- 11.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

12 Links with Other RBH Documents

- 12.1 This policy links to the following policies and strategies:
- Fraud Policy
 - Dignity at Work Policy
 - Grievance Policy
 - Disciplinary Policy
 - People Strategy

13 Inclusivity statement

- 13.1 We are dedicated to fostering an inclusive and equitable environment for all. We ensure that everyone is valued and respected. Our policies aim to be inclusive, and will comply with UK laws, including the Equality Act 2010, to create a diverse and supportive environment for people to thrive.
- 13.2 We understand not everyone absorbs information the same way. If you have any difficulty understanding or interpreting this document please email people@rbh.org.uk or call Freephone 0800 027 7769. We will work with you to ensure your individual needs are met.