



## 1. Purpose

This procedure sets out how someone who is not one of our employees can report a serious concern on a confidential basis, about improper conduct or malpractice by any member of Selwood Housing Group, which includes staff, contractors or our board of directors, and how that report is managed.

#### 2. Contents

- 1. Publicity
- 2. Reporting a concern
- 3. Case management
- 4. Access to personal information
- 5. Malicious reports
- 6. Monitoring

#### 3. Process

## 1. Publicity

An information sheet which contains advice for customers and the public about whistleblowing (see appendix 1) can be found on our website (see appendix 1).

Due to the significant proportion of customers in sheltered housing who are not digitally engaged, we also display posters in the communal areas of those buildings to let residents know how they can report any serious concerns about our staff, contractors or board members (see appendix 2).

## 2. Reporting a concern

Reports should initially be made to the personal assistant to the group chief executive by one of the following means:

- Email whistleblowing@selwoodhousing.com (the group chief executive will also receive a copy of this email)
- Letter PA to group chief executive & group operations director, 4 Selwood Housing, 4 Avro Way, Bowerhill, Melksham,

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Wiltshire SN12 6TP (the envelope should be marked 'private and confidential')

♣ Telephone – 01225 715904 – PA to group chief executive & group operations director,

If the whistleblower is not happy about reporting their concern in this way, they can contact either the chair or vice chair of our board directors by email using the following format:

♣ Name.Surname@selwoodhousing.com.

The names of the chair and vice chair of our board of directors can be found on our website.

Alternatively, they can contact the Regulator of Social Housing whose contact details are as follows.

- ♣ Email enquiries@rsh.gov.uk
- ♣ Letter Referrals and Regulatory Enquiries Team, Level 2, 7-8
  Wellington Place, Leeds LS1 4AP
- ♣ Telephone 0300 124 5225

Offences of a criminal nature should be reported to the Police

- ♣ Telephone 101
- Emergency 999

or anonymously via Crimestoppers.

- ♣ Online <u>crimestoppers give information form</u>
- ♣ Telephone 0800 555 111

The person making the whistleblowing report should be advised that:

i) their report will be acknowledged within 2 working days, giving the name of the person who will be carrying out the investigation

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- ii) the acknowledgement will state that:
  - they will be notified of the outcome of the investigation, including any actions proposed or taken, within 2 weeks of the report being received unless more time is needed to complete the process
  - if more time is required, they will be given a revised investigation completion date before the end of the 2-week period
  - the notification of the outcome of the investigation may not include all of the details of the case for reasons of confidentiality
- iii) whilst their confidentiality will always be maintained where it is within our power to do so, in certain circumstances they may need to come forward at some future date to act as a witness
- iv) their concern will initially be referred to the group chief executive, who will either carry out the investigation or delegate it to one of the executive directors, in conjunction with the group HR manager
- v) a confidential meeting can be arranged for them with the person investigating the report if necessary, and if they wish they can be accompanied by another person such as a relative, friend or advocate
- vi) they will be supported and protected from reprisals or victimisation, and this will apply equally to situations where the concern is justified, or where they come forward in good faith but the concern later turns out to be unfounded
- vii) there are consequences relating to false reporting, because making a false statement that damages the reputation of an individual or a business is defamation of character, and the law is designed to protect and compensate individuals or companies from having their character and reputation improperly damaged
- viii) any information obtained is be covered by our privacy statement which can be found on our website.

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## 3. Case management

The investigator will log the case and all supplementary information obtained in the following location.

- Personal folder of the investigator
- My Docs folder
- Whistleblowing report folder (which must be password protected)

This folder will form the basis of the whistleblowing report case management system, and the investigator must therefore notify the group HR manager of the password for the folder. This will ensure that information related to the case is stored securely.

Information related to the case must not be stored anywhere else such as on our housing management operating system.

At this stage in the process the person under investigation does not need to be given a copy of our privacy statement, as this might prejudice the investigation. However this should be considered on a case by case basis. If the person under investigation is not to be informed about the investigation and given a copy of our privacy statement, the reasons for not doing so should be documented.

Informing any witnesses mentioned in the whistleblowing report that a case has been opened should be done as soon as possible, and they should also be given a copy of our privacy statement. They must also be advised that the matter is confidential and not to discuss the case with anyone else.

Only information relative to the case should be collected, and anything included in the report which is of no relevance or interest to the allegations must not be processed further and should be deleted.

If the concern involves an alleged criminal offence, the whistleblower should be told to report this to the police. However, they should also be advised that because of the serious nature of the report, we are under an obligation to notify the police and supply them with their personal details.

The investigator must carry out their investigation thoroughly and impartially by listening to the accounts of all parties involved. They should also take any necessary measures to protect the customer's safety and

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that of any family members.

## 4. Access to personal information

Requests for access to personal information will be dealt with through our data subject request procedure.

#### 5. Malicious reports

Malicious reports will be assessed to determine if action should be taken against the whistleblower, either for defamation of character and/or breach of tenancy if the person is a customer.

## 6. Monitoring

Whistleblowing reports which have been substantiated will be reported to the next board meeting.

## 4. Signposting

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Anti-money laundering guidance notes
- Anti-money laundering policy
- Anti-money laundering procedures
- Board code of conduct
- Code of conduct policy
- Data protection policy
- Data sharing guidance document
- Data subject request procedure
- Equality and diversity policy
- Fraud, bribery and corruption prevention policy
- Gifts and hospitality policy
- Group governance manual
- Group data protection policy
- Modern slavery statement
- Procurement and contract management policy
- Safeguarding adults policy and procedure
- Safeguarding children policy and procedure
- Selwood Housing Group Group Financial Regulations
- Selwood Housing Society Limited Articles of Association

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- Tenancy fraud policy
- Tenancy fraud procedure
- Whistleblowing for customers procedure

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# **Appendix 1**

# **Whistleblowing**

# How customers can report concerns of a serious nature

## What is whistleblowing?

Whistleblowing is when someone reports serious concerns about something that one of our staff, contractors or board members has done or failed to do.

Examples of whistleblowing concerns might be:

- a failure to meet our legal duties as a landlord, e.g. a failure to carry out fire, electrical or gas safety checks and actions as required
- a member of our staff engaging in criminal activity such as taking bribes
- a member of our staff allowing children or vulnerable adults to be put at risk of harm

#### How to report a concern

Reports can be made to the confidential email address:

- email whistleblowing@selwoodhousing.com
- by letter to the PA to the group chief executive & group operations director, Selwood Housing, 4 Avro Way, Bowerhill, Melksham, Wiltshire SN12 6TP (the envelope should be marked 'private and confidential')
- by telephone 01225 715904 PA to group chief executive & group operations director

#### Other ways to report

If you are not happy to report your concern using the methods suggested above, you can contact one of our board members by email using the following format:

Name.Surname@selwoodhousing.com



A list of our board members can be found on our website.

Alternatively you can contact the regulator of social housing who oversees housing associations, contact details are as follows:

- email enquiries@rsh.gov.uk
- letter referrals and regulatory enquiries team, Level 2, 7-8
   Wellington Place, Leeds LS1 4AP
- telephone 0300 124 5225

Offences of a criminal nature should be reported to the Police:

- telephone 101
- emergency 999

or anonymously via Crimestoppers.

- online form via Crimestoppers https://crimestoppers-uk.org/give-information/forms/pre-form
- telephone 0800 555 111

#### What happens next

We will let you know that we have received your report within two working days, giving the name of the person who will be investigating it.

You will be told the result of the investigation, including any actions proposed or taken, within two weeks of your report being received unless more time is needed to complete the investigation. If more time is required you will be given a revised completion date before the end of the 2-week period.

In telling you the result of the investigation we may not be able to include all of the details of the case for reasons of confidentiality.



If you are acting in good faith when you raise a concern, we will investigate it and make sure that you do not face harassment or victimisation for doing so. However, we will not tolerate someone raising something they know is not true in order to cause trouble for Selwood Housing Group, which includes staff, contractors or our board of directors. If this happens we will take appropriate legal action.

If we are asked to protect your identity we will. However there may be circumstances when we have to disclose information, for example if required to do so by a court of law.

We will also accept and investigate anonymous reports as far as possible.

## Whistleblowing is different to making a complaint

A complaint is where you have concerns about a service you have received that is not up to standard, or where we have failed to provide a service. Examples include a contractor who does not turn up for a prearranged appointment or a member of staff who is rude to customers and acts unprofessionally.

You can find our compliments and complaints policy and our complaints process on our website.

# **Appendix 2**

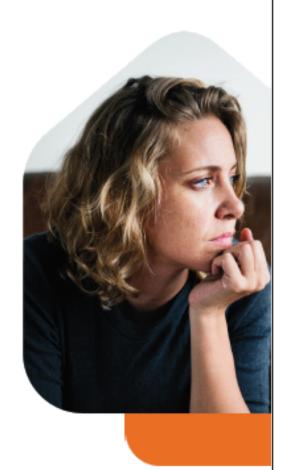
# **Whistleblowing poster**

# How to report a serious concern

Whistleblowing is when someone reports a serious concern about something that one of our staff, contractors or board members has done or failed to do.

# Examples may be:

- A failure to meet a legal duty
- A member of staff engaging in criminal activity
- A member of staff placing children or vulnerable people at risk of harm



# To report a serious concern:

T. 01225 715 904

E. whistleblowing@selwoodhousing.com Write to our group CEO and mark as 'confidential'







# **Decision-making record**

Date	Meeting/Minute Reference	Version /Amendment
27 April 2006	Continuous Improvement & Policy Committee	1
18 February 2011	Head of Neighbourhoods review	2
18 April 2015	Head of Neighbourhoods Review	3
4 August 2015	Scrutiny Team	4
5 November 2019	Executive	5
19 February 2020	Marc Robins	6
8 March 2022	Jason Humphries Publicity section updated and	7
18 January 2023	poster rebranded. Jason Humphries Updated, some minor amendments made and some changes made to the wording.	8

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