The Whiteley Homes Trust

Whistleblowing Policy

Written By	Ossie Klass
Owner	Ossie Klass
Original Policy Date	May 2026
Review Period	Bi-annually
Next Review Date	May 2028
EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
April 2026	**LT/HODs**	**Feedback incorporated into final version**	**FARC**	**12 05 2026**	**1.0**

Introduction

This policy sets out The Whiteley Homes Trust's (the Trust) commitment to fostering an open, transparent, and accountable environment in which concerns can be raised without fear of reprisal.

The Trust encourages all individuals to speak up if they have concerns about wrongdoing or malpractice. All concerns will be taken seriously and handled in accordance with relevant UK legislation and regulatory expectations.

Scope of Applicability

This policy applies to all individuals engaged with the Trust, including employees, agency workers, bank workers, volunteers, and Board members. For the purposes of this policy, these groups are collectively referred to as "employees."

It also applies to residents (including beneficiaries, tenants in our private let homes, and other customers), their family members, and third parties such as contractors, suppliers, and partner organisations that provide services on behalf of the Trust.

The Trust is committed to openness and transparency and aims to ensure that all individuals understand how to raise concerns and feel confident in doing so.

Definitions

Whistleblowing: The disclosure of information by an individual who reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur.

Qualifying Disclosure: A disclosure of information that is made in the public interest and relates to a relevant failure as defined under the Public Interest Disclosure Act 1998.

Relevant Failure: Includes criminal offences, breach of legal obligations, miscarriages of justice, danger to health and safety, environmental damage, or deliberate concealment of any such matters.

Whistleblowing concerns may include:

- Criminal offences (e.g. fraud, theft)
- Failure to comply with a legal obligation
- Miscarriages of justice
- Health and safety risks

- Damage to the environment
- Safeguarding concerns involving residents
- Abuse, neglect, or exploitation of vulnerable adults
- Financial mismanagement or misuse of public funds
- Deliberate concealment of wrongdoing

What is not covered

This policy is not intended for:

- Personal employment concerns (which should be raised under the Grievance Policy)
- Complaints about housing or service delivery (which should be raised under the Complaints Policy)

Legal Framework

This policy is informed by relevant UK legislation, including:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996 (as amended by PIDA)
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Bribery Act 2010
- Fraud Act 2006
- Care Act 2014 (relevant to vulnerable residents)

Policy Statement

The Trust encourages individuals to raise concerns at the earliest opportunity.

All disclosures will be treated seriously, sensitively, and, where possible, confidentially.

No individual will suffer detriment, victimisation, or dismissal for making a qualifying disclosure in good faith, even if the concern is not ultimately substantiated.

Reporting Procedures

We encourage all relevant individuals to raise concerns internally so we can address and resolve them quickly.

Concerns can be raised verbally or in writing and should normally be reported to:

- A line manager
- A senior manager
- A member of the leadership team

If an individual does not feel able to raise the concern through these routes, they may contact the People & Culture Manager or the Chair of the Finance, Audit and Risk Committee.

Where concerns cannot be raised internally, individuals may report to an appropriate external "prescribed person" or regulator. These may include:

- Information Commissioner's Office (data protection concerns)
- Health and Safety Executive
- Regulator of Social Housing
- Local Authority Safeguarding Teams (for safeguarding concerns)
- Care Quality Commission (for safeguarding concerns)

All disclosures will be handled sensitively and, where possible, confidentially. Anonymous disclosures will be considered; however, this may limit the Trust's ability to investigate fully.

Protection and Support

In line with the Public Interest Disclosure Act 1998:

- Individuals are protected from detriment or dismissal where they make a protected disclosure
- Protection applies where the individual reasonably believes the information is true and in the public interest

The Trust will:

- Not tolerate retaliation, victimisation, or harassment
- Treat such behaviour as a disciplinary matter
- Take reasonable steps to protect the identity of the whistleblower

Support mechanisms, such as confidential advice and counselling, are available to those making disclosures.

Investigation Process

All concerns will be handled in a fair, proportionate, and timely manner:

- **Acknowledgement:** within 5 working days (where possible)
- **Initial assessment:** to determine whether the concern falls under this policy
- **Investigation:** conducted impartially and proportionately
- **Outcome:** appropriate action taken
- **Feedback:** provided where lawful and appropriate

All investigations will be conducted in line with data protection requirements.

Roles and Responsibilities

Board and Senior Management:

- Ensure effective whistleblowing arrangements are in place
- Promote a positive "speak-up" culture

Managers:

- Respond appropriately to concerns
- Escalate issues where required

Employees and Others:

- Raise concerns promptly
- Act in good faith

Malicious or False Allegations

No action will be taken where a concern is raised in good faith but is not substantiated.

However, deliberately false or malicious allegations may result in disciplinary action.

Monitoring and Reporting

The Trust will:

- Maintain a record of whistleblowing concerns
- Monitor trends and identify risks
- Report anonymised data to the Board
- Use learning to improve governance and service delivery

Policy Review

This policy will be reviewed every two years, or sooner where there are changes in legislation, regulation, or organisational need.

Feedback is encouraged to ensure the policy remains effective and accessible.