

Plus Dane Housing

Whistleblowing Policy

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1 Policy Statement

Plus Dane is committed to high standards of probity, openness and accountability. This Policy is designed to encourage staff, individuals or companies that are providing goods or services to Plus Dane and who have serious concerns about any aspect of its work, feel confident to come forward and express those concerns without fear of penalty or punishment. This will allow the matter to be investigated and action taken rather than a serious matter being overlooked or communicated to outside sources.

2 Policy Aims

The aims and objectives of this policy are to:

- Encourage individuals to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues for individuals to raise those concerns and receive feedback on any action taken;
- Reassure staff, individuals or companies that they will be protected from possible reprisals or victimisation if they have made any disclosure in the public interest.

3 Links to corporate plan

This policy supports our objective of being ambitious with a keen focus on delivering excellent services to tenants and customers alongside ensuring that value for money and efficiency is pursued at all times.

4 Our Approach

This policy applies to all Plus Dane staff, tenants and residents, customers and clients, and associated companies.

The Policy does not cover matters that are covered by other policies or procedures. These may include:

- Staff complaints about their employment.
- Anti-Money Laundering, Anti-Fraud and Anti-Bribery & Corruption policies.
- Customer complaints about our services.
- Allegations of bullying or harassment which are not due to raising concerns under the Whistleblowing Policy.

The Public Interest Disclosure Act 1998 provides protection to anyone who is “making a disclosure in the public interest”. This covers situations where an individual raises serious concerns or passes on information concerning wrongdoing, typically in a work environment.

Disclosures must be in the public interest which usually means that it must affect others and should not be a personal grievance or complaint.

This could include:

- that a criminal offence has been committed, is being committed or is likely to be committed,
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,
- that a miscarriage of justice has occurred, is occurring or is likely to occur,

- that the health or safety of any individual has been, is being or is likely to be endangered,
- that the environment has been, is being or is likely to be damaged;
- that there is evidence of, or suspicion that, modern slavery or human trafficking is occurring; or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

In most cases concerns should be raised with the direct line manager. Should this not be appropriate, for example because they are the person about whom there are concerns, an approach should be made to that person's line manager.

If this is not felt to be appropriate, for the same or other reasons, then an approach should be made to the Head of Governance and Assurance or the Director of People.

Should there be any other cause for concern in which it is felt the above approaches are unsuitable, or inappropriate, then a direct notification may be made to the Chair of Audit and Risk Committee, who may in turn determine whether to appoint a senior manager to investigate, and/or may seek advice from the Internal Auditors.

Plus Dane recognises that the decision to report a concern can be difficult, not least, because of fear of reprisal as a result of making a report. Staff must not suffer any detrimental treatment as a result of raising a concern in good faith.

Detrimental treatment includes dismissal, disciplinary actions, threats, harassment, victimisation and any other unfavourable treatment and action will be taken to protect individuals in these circumstances.

Plus Dane recognises that employees may wish to seek advice and be represented by their trade union representative or a colleague when using the provisions of this policy. Plus Dane will support employees who disclose information relating to abuse towards residents by other staff members.

Plus Dane will do its best to protect an individual's identity when a concern is raised unless there is a requirement in law to make this known. As part of the investigation process conducted as a result of whistleblowing the investigation may reveal the source of the information and a statement by the individual may be required as part of the evidence.

This Policy encourages individuals to give their name when allegations are made. Concerns raised anonymously tend to be far less effective but they will be considered at the discretion of Plus Dane, dependent on the seriousness of the allegation and the credibility of the concern.

Further guidance on how to raise concerns under this policy will be found in the Whistleblowing Procedures and associated guidance.

5 Assurance

The implementation of this policy will be within the scope and control of the Head of Governance and Assurance.

General information on the Plus Dane approach and commitment to supporting whistleblowing will be readily available on internal and external websites and will be further promoted from time to time to raise awareness.

Monitoring of the implementation and application of this policy will be through the Audit and Risk Committee.

The Public Interest Disclosure Act 1998 provides protection to anyone who is “**making a disclosure in the public interest**”. In order for a disclosure to gain statutory protection it must relate to one of the following matters:

- A criminal offence.
- Failure to comply with any legal obligation.
- A miscarriage of justice.
- Danger to health and safety of any individual.
- Danger to the environment.
- Deliberate concealment of any of the above.