

Whistleblowing Policy



Contents

| | |
|--|----------|
| 1 Aims | 1 |
| 2 Scope | 1 |
| 3 Policy Statement | 1 |
| 3.1 Whistleblowing | 1 |
| 3.2 Reporting Whistleblowing | 2 |
| 3.3 Investigation | 3 |
| 3.4 Confidentiality | 4 |
| 4 Legislation and Regulation | 4 |
| 5 Document Control | 4 |

1 Aims

1. This policy allows staff, board members or third parties to raise concerns about actions or behaviour when, owing to the nature or severity of the concern, it would be inappropriate to use normal channels.

2 Scope

2. This policy is applicable to anyone who has been involved in either the delivery, provision or receipt of services to or from the Jigsaw Homes Group (the Group).

3 Policy Statement

3. This policy provides an environment where either employees, board members or third parties can, in confidence, report legitimate concerns regarding the Group's activities without the fear of reprisal.
4. For the purposes of this policy an individual or an organisation making a whistleblowing report is referred to as a reporting party.

3.1. Whistleblowing

5. Whistleblowing is more formally known as making a disclosure in the public interest. It is the act of disclosing information which relates to suspected malpractices or dangers at work such as:
 - Criminal or unlawful activity.
 - Bribery.
 - Financial fraud or mismanagement.
 - Breach of any other legal obligation.
 - Negligence.
 - Unauthorised disclosure of confidential information.
 - Danger to health and safety.
 - Damage to the environment.
 - Undisclosed conflict of interest.
 - Harassment or discrimination.

6. The Group recognises that the decision to whistle blow can be daunting for fear of reprisal or victimisation. The Group will not tolerate harassment or victimisation of anyone raising a concern and the Group will take necessary action to protect any reporting party who has raised a concern which they believe to be true.
7. A reporting party wishing to whistle blow must be satisfied that they reasonably believe that the disclosure is in the interest of the Group. Any reporting party making a whistleblowing concern must not act maliciously, make a false allegation or try to seek personal gain. The Group will consider maliciously false whistleblowing allegations made by employees and board members under its disciplinary procedure. The Group may seek legal redress for maliciously false whistleblowing claims made by a reporting party from outside of the business.
8. When raising a concern the reporting party should provide as much information as possible as this will assist in the investigation of the report.
9. The reporting party is encouraged to put their name to the concern. Anonymous concerns, although less powerful, will still be considered and investigated at the Group's discretion. The Group views the most effective way to express a concern is to do so openly. This enables the Group to investigate and act appropriately. A reporting party may want to raise a concern in confidence and the Group will respect any request for confidentiality. However, in a situation where a concern will not be resolved without the reporting party's identity being revealed, the Group will advise the reporting party before proceeding.
10. Although this policy allows a reporting party to raise concerns about how the business has operated, it is not designed to question financial or business decisions taken by the Group, nor may it be used to reconsider any matters which have already been addressed under the grievance, complaint or disciplinary procedures.
11. Any employee or board member receiving a whistle blowing report must ensure that the matter is immediately brought to the attention of the Group Company Secretary. If it is considered by the employee or board member who received the report that notifying the Group Company Secretary would have an adverse impact upon the report then they must notify either the Group Director of Corporate Services or the Group Chief Executive.
12. The Audit and Risk Committee has responsibility for whistleblowing. All concerns
13. raised under the whistleblowing policy will be reported to the Risk and Audit Committee.

3.2. Reporting Whistleblowing

Employees as the Reporting Party

14. Employee's first contact should be their line manager with their subject of concern. Where employees feel unable or unwilling to take up a concern with their immediate line manager, they should contact their Executive/Group Director. Where disclosure to Executive/Group Director is felt to be inappropriate then employees should contact the Group Company Secretary.

15. It is the responsibility of the line managers to report any whistleblowing concerns they are made aware of to the Group Company Secretary. Line managers should not seek to investigate these concerns themselves.

Board Members as the Reporting Party

16. Board members should report their concern to their Chair and the Group Company Secretary. If the board member feels unable to do so they should contact either the Group Chair, the Chair of Risk & Audit Committee or the Group Chief Executive.

Third Parties and Anonymous Reporting

17. Third parties or anonymous reports can be made in writing to the Group Company Secretary at the Head Office address. Correspondence should be marked “private and confidential - for the attention of the Group Company Secretary only”.

Fallback Position

18. Should the nature of the concern mean that the whistleblowing options set out above are not achievable a reporting party may, as a last resort, contact the Group’s External Auditors:
19. Beever and Struthers, Chartered Accountants and Business Advisors
20. St George’s House,
21. 215-219 Chester Road
22. Manchester
23. M15 4JE
24. 0161 832 4901

3.3. Investigation

25. All reports will be treated fairly and investigated as sensitively and quickly as possible.
26. Immediately upon being made aware of a whistleblowing report the Group Company Secretary will determine:
 - Immediate requirements relating to confidentiality and preservation of evidence
 - The people relevant to the investigation
 - Method of investigation
 - Reporting/notification requirements (for example, Regulators)
 - Any others who need to be involved (for example, Internal Audit, Insurers)

27. If the whistleblowing report relates to, or directly involves the Group Company Secretary the actions identified in this section will be completed by either the Group Director of Corporate Services or the Group Chief Executive.

3.4. Confidentiality

28. At all times confidentiality must be respected by all parties. The Group will keep the reporting party informed of the steps it has taken to review the concern as well as the outcome of the review where it is possible to do so.
29. If the reporting party abuses the confidentiality of the reporting process, then the Group will consider an appropriate sanction. For example, an employee making a disclosure to the media without the consent of the Group may be considered as a disciplinary matter.
30. In the case of continued vexatious claims made by third parties the Group reserves the right to seek legal redress against reporting party making such claims.

4 Legislation and Regulation

31. The relevant legislation and regulatory standards which underpin this policy are:

- Theft Act 1968
- Employment Rights Act 1996
- **Public Interest Disclosure Act 1998**
- Fraud Act 2006
- Equality Act 2010
- Bribery Act of 2010
- Enterprise and Regulatory Reform Act 2013
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Data Protection Act 2018
- National Housing Federation Code of Governance 2020
- National Housing Federation Code of Conduct 2022

5 Document Control

| | |
|------------------------|--|
| Responsible Officer/s: | Mike Murphy, Operations Director Governance and Regulation |
| Date of Approval: | 12 September 2024 |
| Approved by: | Group Board |
| To be Reviewed Every: | Two years |



Creating homes. Building lives.

Jigsaw Homes Group Ltd.

Cavendish 249
Cavendish Street
Ashton-under-Lyne
OL6 7AT

<https://www.jigsawhomes.org.uk>
0300 111 1133
info@jigsawhomes.org.uk

Regulated by the Regulator of Social Housing Registration No. LH 4345

Registered under the Co-operative and Community Benefit Societies Act 2014 Registration No. 29433R

Document produced on 4 October 2024.