



**KINGDOM**  
Group

# Whistleblowing Policy

If you need this publication in larger print, audio form, Braille, or in another language, please contact our office and we will try to help you.



HAPPY TO TRANSLATE

Approved: 1 October 2019  
Next Review: October 2024

# WHISTLEBLOWING POLICY

## 1. Introduction

This policy should be read in conjunction with the Whistleblowing process.

The Public Disclosure Act 1998 aims to protect individuals who make certain disclosures of information in the public interest. This is referred to as Whistleblowing.

This policy is a Kingdom Group policy applying to Kingdom Housing Association Limited and all its subsidiary companies. We will refer to 'Kingdom' throughout this policy and unless specifically stated this means all the companies of the Kingdom Group.

This policy applies to all employees and governing body members. For the purpose of this policy, employees include bank and agency workers, volunteers and those on placement.

This policy also applies to any other person who may have serious concerns relating to conduct or practices within our organisation.

You are a whistleblower if you report certain types of wrongdoing.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

As a whistleblower you are protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

This policy aims to:

- Encourage our people to feel confident in raising concerns, internally in the first instance, and to question and act upon concerns about wrongdoing.
- Provide avenues for our people to raise concerns and receive feedback on any action taken.
- Allow our people to take the matter further if they are dissatisfied with our response.
- Offer our people protection for whistleblowing in good faith.

We are committed to the highest standards of openness, probity and accountability. In that, we will enable our people to voice concerns in a responsible and effective manner.

We encourage those who have serious concerns about any aspect of our work to come forward and speak up without fear of reprisal.



We will make this policy available in a variety of formats upon request, including large print, translated into another language or on audio tape. We will also make reasonable adjustments to assist if you have a disability.

## **2. General Principles**

### Whistleblowing Complaints

You are protected by law as a whistleblower if you report any of the following:

- a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance
- you believe someone is covering up wrongdoing

This list is not exhaustive but is intended to give some examples of the issues which may be covered by this policy.

We will support all those who raise an honest and reasonable suspicion of wrongdoing, both during any investigation and following its conclusion.

We will ensure our people will be protected from reprisals or victimisation where they raise concerns in good faith.

You should be aware that disclosures made to the media will not normally provide you with protection in terms of the Public Interest Disclosure Act 1998 or this policy.

There might be certain situations where disclosures need to be made to external regulators when the perceived wrongdoing involves senior members of staff or the governing body.

### Complaints that do not count as whistleblowing

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law or this policy, unless your particular case is in the public interest. These should be reported through our grievance process.

### **Roles, Responsibilities and Delegated Authority**

The Chief Executive is responsible for having effective arrangements and a policy for whistleblowing.

The policy should be made readily available and promoted.



The Senior Management team are responsible for ensuring that employees within their department are aware of and understand the whistleblowing policy.

The Chief Executive will ensure the Governing body members fully understand their roles and responsibilities regarding whistleblowing.

### **Monitoring and Review**

This policy will be reviewed 5 years from the date of implementation or latest review; which will be the date the policy is approved by the governing body, or earlier if deemed appropriate. In the event that this policy is not reviewed within the above timescale, the latest approved policy will continue to apply.



## KINGDOM GROUP

### WHISTLEBLOWING POLICY

**Policy based on the following legislation:**

Public Interest Disclosure Act 1998  
The Enterprise and Regulatory Reform Act 2013

**Reference made to the following sources and other guidance:**

[www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

Whistleblowing about a regulated body - Information for potential whistleblowers – April 2015

Whistleblowing about a regulated body - Information for regulated bodies about how the Scottish Housing Regulator deals with whistleblowing – April 2015

Public Concern at Work: Making Whistleblowing Work  
HSE Guidance: Whistleblowing: Your Rights

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Policy Sub Committee: 25 June 2019

Kingdom Housing Association: 19 August 2019

Kingdom Initiatives Limited: 1 October 2019

Kingdom Support and Care: 15 August 2019

Next review date: 1 October 2024

