

Whistleblowing Policy

Policy Statement & Purpose

Openness, transparency and accountability are key to our work and it is important that any fraud, misconduct or wrongdoing by colleagues, Directors, or Board members is properly dealt with. We therefore encourage all colleagues to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run.

Concerns can cover a wide range of matters such as:

- actual or potential criminal offences, for example, theft, fraud, corruption or malpractice
- failure to comply with a legal and regulatory obligations, for example, unsafe working conditions, health & safety or the care and protection of minors or vulnerable people;
- abuse or neglect of vulnerable people and failure to safeguard customers;
- failure to deliver proper standards of service;
- undisclosed personal conflicts of interest;
- bullying, harassment - including inappropriate advances and/or behaviour;
- all types of discrimination or victimisation in the workplace;
- risk or actual damage to the environment;
- a miscarriage of justice;
- circumstances that may give rise to enhanced risk of slavery or human trafficking; or
- concealment of any of the above.

Any instruction you might receive to cover up a wrongdoing is a disciplinary offence and you should tell someone straight away.

If you are told not to raise or pursue an issue you should not agree to remain silent, and understand this will be dealt with in confidence and not a disciplinary issue for the person reporting. You should report the matter to your line manager, a leader in the business or with the People Team at Bromford or the HR Team at Merlin

Scope

As of the 2nd July 2018, this policy replaces the Bromford 'Confidential Reporting Policy'.

It applies to all employees. Other individuals performing functions in relation to Bromford Housing Group, such as agency workers and contractors, are encouraged to use it.

- This procedure is for disclosures about matters other than a breach of your own contract of employment. If you are concerned that your own contract has been, or is likely to be, broken, you should use the appropriate Merlin or Bromford grievance

procedure.

Reference Documents

This policy is published on our group intranet ('Mint/OurSpace').

Additional guidance, related policies and procedures:

Bromford	Merlin
Bromford Whistleblowing How To Guide	Merlin Whistleblowing Flow Chart
Bromford's Disciplinary and Grievance Policy	

Legislative Requirements

Bromford's policy is to comply with Whistleblowing legislation.

- [Government Whistleblowing Guidance](#)

Responsibilities

For queries about this Policy please contact the People Team at Bromford or HR at Merlin.

The Board has overall responsibility for this policy.

Line Managers are responsible for:

Engaging with their team to:

- Implement and maintain the processes and procedures
- Ensure that their people are aware of their responsibilities and receive appropriate training

All employees are responsible for:

- Carrying out their work in line with this policy and associated procedures
- Applying our values and behaviours in everything they do

Policy Principles

Any matter raised will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to you if you raised the issue.

You will not be victimised for raising a matter. This means that your continued employment and opportunities for future promotion or training will not be prejudiced because you raised a legitimate concern. If you are victimised for raising a qualified disclosure, we will consider this to be a disciplinary offence.

If misconduct is discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.

Maliciously making a false allegation is a disciplinary offence.

How seriously will Bromford take my concerns?

We will:

- investigate all legitimate concerns;
- pursue fraud and serious abuse via our disciplinary procedures or through the courts if necessary;
- report all criminal offences to the Police;
- report inappropriate behaviour in line with our Safeguarding Policy.

Safeguards for employees

We recognise that Colleagues may sometimes be reluctant to raise concerns, however the following safeguards will be applied:

- We will support and protect employees who raise a concern about harassment/victimisation (including informal pressures). We will investigate any claims of harassment/victimisation and, depending on the outcome, may take disciplinary action against the perpetrator.
- All reported wrong-doings will be treated in absolute confidence, with every effort made not to reveal your identity if you so wish. At the appropriate time, however, you may need to become an identified witness, particularly if it has not been possible to substantiate the allegations by other means. The implications of this and the setting up of appropriate support or protection arrangements will be carefully and sensitively discussed with you.
- You and managers to whom allegations are disclosed, must ensure absolute confidentiality in all areas, including amongst service users and other colleagues.

Advice for Leaders

A colleague will have thought long and hard about whether to raise a matter and is probably nervous or worried about doing so. If a matter is raised you should treat it very seriously and take immediate steps as set out in the Bromford 'How To' and Merlin Procedure guides.

Whistleblowing complaints are very unusual so we know this will probably be the first time you have dealt with such a matter. You will need to consider and agree with your Director whether you are the right person to investigate the matter raised.

If you are unclear about anything then please take advice. If appropriate you could speak to your own leader, your Head of Service or Functional director. You might wish to speak to HR at Merlin, the People Team at Bromford or Governance, Risk and Assurance Team.

Once an issue has been raised you should continue to keep your Director informed of progress and continue to seek advice as you progress.

In any matter your first concern is for the safety and wellbeing of others and you should take any immediate action to protect the safety of individuals.

Detailed information is set out in the **Reference Documents** section of this Policy.

Risks

Failure to manage and mitigate financial crime, fraud bribery and corruption.

Policies, frameworks and training is in place to mitigate against fraud. Procedures exist to allow staff member to report any suspicions in an anonymous way.

Assurance Framework

All staff are required to confirm they have read and understand this policy.

Annual whistleblowing update report provided to Board.

We will produce an annual compliance statement and have periodic reviews to confirm that we follow the policy principles.

This policy will be reviewed every three years or sooner if changes are made to organisational structure, responsibilities, assurance arrangements or due to changes in the external environment.

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