

1. INTRODUCTION

- 1.1. All organisations face the risk of things going wrong or of unknowingly harbouring malpractice.
- 1.2. The Association takes malpractice very seriously. We are committed to conducting our business with honesty and integrity and we expect all staff to maintain exacting standards too.
- 1.3. We encourage a 'speak-up culture,' reflecting our values of integrity, fairness, striving for excellence, and valuing the individual, where concerns are welcomed, taken seriously, and acted upon, and SLT is accountable for appropriate responses.
- 1.4. From 6th April 2026, sexual harassment will explicitly be a qualifying protected disclosure under the Employment Rights Act 2025, meaning individuals raising such concerns are protected from detriment or unfair dismissal.
- 1.5. All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection.
- 1.6. It does not matter if an individual raising a concern is mistaken. Staff are not required to prove the allegation they are making; however, they must reasonably believe that the disclosure is made in the public interest and that the information they provide tends to indicate malpractice.
- 1.7. Staff will not be at risk of losing their job or suffering any form of reprisal as a result of raising a concern under this policy. The Board and SLT will not tolerate the harassment or victimisation of anyone raising a genuine concern and consider it a disciplinary matter to victimise anyone who has raised a genuine concern.
- 1.8. This policy also supports compliance with the Social Housing (Regulation) Act 2023, the Supported Housing (Regulatory Oversight) Act 2023, the Consumer Standards, the Conduct and Competence Standard, and Ofsted regulations, ensuring that disclosures are managed appropriately to safeguard Tenants, Residents and Service Users (TRS), staff, and organisational integrity.

2. PURPOSE

- 2.1. This policy sets out how individuals can raise a protected disclosure about wrongdoing and how those concerns will be handled fairly, consistently, and appropriately, in line with legal, regulatory, and values-driven expectations.

3. SCOPE

- 3.1. This policy applies to all employees, officers, consultants, contractors, and other third parties working for or on behalf of the Association, including agency workers, volunteers, apprentices, student placements, and home workers.

- 3.2.** This policy does not form part of any contract of employment, and the Association may amend it at any time.

4. WHEN TO USE THIS POLICY

- 4.1** Whistleblowing applies where an individual raises a concern in the public interest.
- 4.2.** This includes risks to Tenants, Residents and Service Users (TRS), staff, the public, or the Association arising from systemic failures, unlawful conduct, safeguarding concerns, or serious misconduct.
- 4.3** Personal employment concerns are normally dealt with under the Grievance Procedure. However, concerns relating to bullying, harassment, or sexual harassment may be raised under this policy where there is a wider public interest concern, such as systemic failings, abuse of power, cultural issues, or risks to others.
- 4.4** Concerns relating solely to an individual's personal employment situation should normally be dealt with under the Grievance Procedure.

5. MALPRACTICE COVERED BY THIS POLICY

- 5.1** Whistleblowing is the reporting of suspected wrongdoing, malpractice, illegal activity, or risks arising from the Association's activities.
- 5.2** The types of wrongdoing covered by this policy include, but are not limited to:
- Criminal offences.
 - Breaches of legal, regulatory, or professional obligations.
 - Miscarriages of justice.
 - Risks to the health, safety, or wellbeing of any individual, including Tenants, Residents and Service Users (TRS).
 - Damage to the environment.
 - Abuse, neglect, exploitation, or safeguarding concerns involving TRS.
 - Bullying, harassment, or sexual harassment where there is a wider public interest concern.
 - Financial misconduct, fraud, or misuse of resources.
 - Deliberate concealment of any of the above matters.
- 5.3** This policy also applies to concerns relating to compliance with standards set by the Regulator of Social Housing and, where applicable, Ofsted and other relevant regulatory bodies, particularly where there is a risk of harm, serious detriment, service failure, safeguarding failure, or breaches affecting Tenants, Residents and Service Users (TRS). It supports compliance with the Consumer Standards, the Conduct and Competence Standard, and relevant safeguarding and regulatory requirements.
- 5.4** This policy also covers matters which are specific to the Company, namely Charitable Community Benefit Society registered with the Financial Conduct Authority Register Number 20853R, Social Housing Regulator Registered Number LH1388.

6. OUR COMMITMENT

- 6.1. Adullam Homes Housing Association Limited is committed to ensuring that individuals who raise concerns are protected, supported, and treated fairly.
- 6.2. All concerns raised will be taken seriously and will be assessed and addressed in accordance with this policy.
- 6.3. Requests for confidentiality will be respected wherever possible. However, this may be subject to legal, safeguarding, and regulatory requirements, including circumstances where disclosure is necessary.

7. HOW TO RAISE A CONCERN

- 7.1. Concerns should normally be raised with the individual's immediate Line Manager or, where this is not appropriate, with a designated contact within the Association.
- 7.2. Where it is not appropriate to raise a concern with a line manager or designated contact, concerns may be raised with:

- Ceri Murphy, Assistant Director, People - 07960 614165
- Rehman Mazher, People Partner - 07717 715206
- Cleo Holsgrove, People Partner - 07842 017523

7.3 Independent and External Reporting Routes

Individuals may also raise concerns through independent or confidential external channels, including seeking advice or support from Protect.

7.4 Escalation to the Board

Where a concern relates to senior management, including the Chief Executive Officer, or where an individual reasonably feels unable to use the internal reporting routes set out in this policy, the matter may be raised with the Board. The Board will ensure the concern is appropriately recorded and that suitable governance arrangements are in place for independent investigation and oversight.

7.5. Board Whistleblowing Oversight

7.5.1. The Chair of the Board is designated as the Lead Board Whistleblowing Representative. This role is responsible for providing Board-level oversight and assurance of the effectiveness, independence, and integrity of the whistleblowing framework. The role has no operational involvement in receiving, assessing, investigating, managing, or determining whistleblowing concerns.

7.5.2. Whistleblowing concerns are managed operationally outside of the Board in accordance with this policy. The Board's role is limited to receiving assurance that concerns are being handled appropriately, that independent investigation arrangements are in place where required, and that any systemic issues or learning points are identified.

- 7.5.3.** The Lead Board Whistleblowing Representative provides assurance to the Board that the framework is operating effectively and that escalated concerns are being appropriately managed. The Board receives proportionate assurance information on progress, outcomes, and emerging risks or themes, rather than operational case detail.

7.6. Conflict of Interest and Board Escalation

- 7.6.1.** Where a whistleblowing concern involves the Chair of the Board, or where there is a conflict of interest (actual or perceived involving the Chair), the Chair will be recused from any involvement in the matter. In such circumstances, the Chair of the Finance, Audit and Risk Management (FARM) Committee will assume Board-level oversight of the specific concern immediately.
- 7.6.2.** The FARM Chair will ensure appropriate governance arrangements are in place, including independent investigation of the concern and provision of appropriate assurance to the Board on progress, outcomes, and any wider organisational learning.

7.7 Investigation of Senior Leadership Team and Chief Executive Officer Concerns

Where a whistleblowing concern relates to a member of the Senior Leadership Team or the Chief Executive Officer, the Chair of the Board (or, where conflicted, the Chair of the Finance, Audit and Risk Management (FARM) Committee) will ensure that appropriate independent investigation and governance arrangements are in place.

The investigator must be independent of the individual concerned and must not have any reporting line, management responsibility, or other relationship that could reasonably be perceived to compromise independence.

Investigations may be carried out by:

- Internal Audit, where independent of the area under review
- A senior manager with no involvement in the area under investigation
- An external investigator or specialist organisation (normally used for CEO-level or high-risk, sensitive, or complex matters)

The investigator will gather evidence, interview relevant individuals, and produce a factual report. The Chair of the Board (or FARM Chair, where applicable) will receive the report and ensure appropriate consideration is given to any required actions, including escalation to the Board where necessary.

- 7.8.** Concerns may be raised in writing, verbally, or in person. Written disclosures are encouraged. Individuals should provide:
- the nature of the concern
 - why they believe it to be true
 - relevant background and dates where possible

- 7.9.** A Whistleblowing Disclosure Form is available but not mandatory (see Appendix 1).

8. RESPONDING TO CONCERNS

- 8.1.** All concerns will be handled appropriately, consistently, fairly, and professionally, in line with the Association's values and relevant regulatory standards.
- 8.2.** A meeting will normally be arranged to discuss the concern. Individuals may be accompanied by a colleague or Trade Union representative.
- 8.3.** Concerns will be recorded and, where appropriate, included within the Association's risk management processes (see Appendix 2).
- 8.4.** Significant concerns, particularly those involving resident safety, safeguarding, sexual harassment, serious misconduct, or potential regulatory breaches, will be escalated in line with the governance arrangements set out in this policy and considered for external reporting, where required.
- 8.5.** Investigations will be conducted impartially and, where appropriate, independently of the area concerned. External investigators may be appointed where necessary.
- 8.6.** The Association will aim to complete investigations within a reasonable timeframe and will provide updates to the individual raising the concern where appropriate, subject to confidentiality and the nature of the investigation.
- 8.7.** The Association may be unable to share certain information with the individual where doing so would breach legal, safeguarding, or confidentiality obligations owed to others.

9. CONFIDENTIALITY AND ANONYMITY

- 9.1.** All concerns will be treated confidentially wherever possible.
- 9.2.** Anonymous disclosures are permitted but may limit the ability to investigate or provide feedback.
- 9.3.** In cases involving safeguarding, serious risk, or regulatory obligations, confidentiality may be overridden to protect individuals or comply with the law.

10. RAISING CONCERNS EXTERNALLY (EXCEPTIONAL CASES)

- 10.1.** The Association encourages concerns to be raised internally where possible.
- 10.2.** Nothing in this policy prevents individuals from making a protected disclosure to a prescribed person where permitted by law.
- 10.3.** This may include regulators, professional bodies, or other appropriate organisations.
- 10.4.** A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available on the GOV.UK website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2>
- 10.5.** Individuals may seek independent advice before making an external disclosure.

- 10.6.** Disclosures to external bodies, including regulators or wider disclosures, may be protected under law where specific conditions are met.
- 10.8.** Protect (see Appendix 4) is the UK's whistleblowing charity and aims to stop harm by encouraging safe whistleblowing. It is a source of further information and advice. The Association has membership and access to services for staff. Protect operate the Advice Line on most UK normal working days via telephone or a web-based contact form/email service.
- 10.9.** Protect can be contacted on 020 3117 2520 or by email at whistle@protect-advice.org.uk. They can talk you through your options and help you with advice on whistleblowing issues; the channels where concerns can be raised and how they can be communicated most effectively and how the reporting of concerns may impact on a whistleblower's personal situation within the workplace, how this risk can be mitigated and the legal protections available if victimisation does occur. The Protect Advice Line does not replace any of your existing whistleblowing channels and is not in itself a channel to escalate a concern.
- 10.10.** Individuals can also contact their Union (where applicable) for advice.

11. DISCLOSURE TO THE MEDIA

- 11.1.** Individuals are encouraged to use the internal whistleblowing procedures before making any external disclosures, including to the media. External disclosures made without first following internal procedures may not be protected under the Public Interest Disclosure Act 1998 (PIDA), unless specific legal conditions are met.
- 11.2.** If an individual feels that their concern has not been appropriately addressed through the Association's internal whistleblowing procedures, they are encouraged to seek independent advice, including legal advice or guidance from organisations such as Protect, before making any further external disclosures. Protection under PIDA applies only in certain circumstances and depends on how and to whom the disclosure is made.

12. PROTECTION AND SUPPORT

- 12.1.** Individuals who raise concerns in good faith will be supported, even if the concern is not ultimately substantiated.
- 12.2.** The Association is committed to ensuring that no individual suffers detriment as a result of raising a concern under this policy.
- 12.3.** Retaliation, harassment, or victimisation of any individual who raises a concern will not be tolerated and may result in disciplinary action.
- 12.4.** Disciplinary action may be taken where an individual knowingly raises a false concern in bad faith. No action will be taken where a concern is raised honestly and in good faith, even if it is later found to be mistaken.
- 12.5.** Support, including access to counselling and employee assistance services, is available where appropriate through Medicash, which can be accessed as follows:

- Counselling Service - 0345 565 1851
- Access via: WWW.MEDICASH.ORG/MY-EAP
- Access via the Medicash app

13. RELATED MATTERS

- 13.1.** Concerns relating to bribery, corruption, or financial irregularities may also be raised under this policy.

14.FURTHER INFORMATION AND CONTACTS

- 14.1.** If you have any queries about the application of this policy, please contact the People Team in the first instance.
- 14.2.** This policy is intended to provide reassurance and encourage individuals to raise concerns internally with the Association. However, we recognise that there may be circumstances where individuals feel it is appropriate to report a concern externally.
- 14.3.** Individuals may also raise concerns with relevant external bodies, including the Regulator of Social Housing, the Health and Safety Executive, or other prescribed persons or organisations.

15. HOUSING, SAFEGUARDING AND TRS SAFETY

- 15.1.** The Association recognises its responsibilities as a supported housing provider and its duty to safeguard Tenants, Residents and Service Users (TRS).
- 15.2.** This policy applies to concerns affecting TRS, including but not limited to:
- Safeguarding concerns.
 - Unsafe or unsuitable housing conditions.
 - Failure to provide appropriate care or support.
 - Behaviour or circumstances that may cause, or place individuals at risk of, serious harm or detriment.
- 15.3.** Such concerns will be treated as high priority and managed in accordance with safeguarding procedures and governance arrangements. Where appropriate, they will be escalated internally and may be reported to external regulators or statutory agencies.

16. IMPLEMENTATION

This policy will be published on Policy Hub.

17. GOVERNANCE AND OVERSIGHT

- 17.1.** Governance and oversight of whistleblowing arrangements are undertaken in line with Section 7 of this policy.
- 17.2.** The Board receives proportionate assurance reporting on the effectiveness of whistleblowing arrangements, including themes, outcomes, and learning points, in accordance with the governance framework set out in this policy.

18. PERIOD OF REVIEW

This policy will be reviewed where:

- 18.1.** There are significant changes to legislation or regulation.
- 18.2.** There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations at which point the Lead Officer will initiate an immediate review.

In any event this policy will be reviewed no later than three years from the effective date of this version.

Appendix One: Whistleblowing Disclosure Form

When to use this model whistleblowing form

For the employee to make a formal disclosure.

Form wording

Making a public interest disclosure (whistleblowing)

This form is intended for use by any individual working in Adullam Homes Housing Association Ltd. (including contractors, agency workers and volunteers) who wish to raise an issue about wrongdoing.

This form should be used to report wrongdoing within the Association (for example, misconduct of a safeguarding nature, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you would like to make an allegation of bullying or harassment or are complaining that your contract of employment has been breached).

If you are unsure about whether your concerns are best dealt with under the Association's Whistleblowing Policy or Grievance Procedure, please read the Association's Whistleblowing Policy, which provides an example of the issues that should be reported using this form. If, having read the whistleblowing policy, you remain unsure about which procedure to use, please consult the Assistant Director People or a People Partner for further advice.

Once you have submitted this form, the Association's Whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone you may have implicated below.

In certain circumstances, you can request that your concerns be kept anonymous. Where possible, the Association will respect a request for anonymity but cannot guarantee that it will be able to do so.

This form should be completed and delivered to Ceri Murphy, Assistant Director, People c/o Adullam Homes Housing Association Limited, Walter Moore House, 34 Dudley Street, West Bromwich, West Midlands, B70 9LS, in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line.

Formal public interest disclosure (whistleblowing) * optional if you wish to maintain your anonymity

Employee's name*:

Employee's job title:

Date:

To whom does your public interest disclosure relate?

Summary of disclosure:

Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations, and the identities of those involved. You may attach additional sheets if required. When completing this section consider the following:

1) What was the misconduct which had occurred? 2) Who had committed the misconduct? 3) When did it happen and when did you notice it? 4) Where did it happen? 5) Is there any evidence that you could provide? 6) Are there any other parties involved? 7) Do you have any other details or information which would assist us in the investigation?	
Individuals involved:	
Please provide the names and contact details of any people involved in your concerns, including witnesses.	
Outcome requested:	
Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.	
Declaration:	
I confirm that the above statements are true to the best of my knowledge, information, and belief. I understand that, if I knowingly make false allegations, this may result in the Association taking disciplinary action against me.	
Form completed by:	
Name* (please print)	
Signature*:	
For completion by the Assistant Director, People or Deputy	
Date form received by Assistant Director, People /People Partner	
Name of recipient and job role:	
Signature:	

* Optional, if wish to maintain your anonymity

Appendix Two: Whistleblowing Register

Whistleblowing Complaint		
Complaint Number		
Received by		
Received on		
Acknowledgement sent on		
Investigation Officer appointed	Yes	No
Name of Investigating Officer		
This section is to be completed when investigation is concluded		
Investigation outcome		
Actions taken		
Signed off by		
Date		

Appendix Three: Highly Confidential - Whistleblowing Investigation Report

Investigation Officer(s)	
Complaint Received on	
Investigation initiated on	
Investigation concluded on	

1. Introduction

This case relates to a whistleblowing concern raised with the.....

2. Remit

The investigation was initiated to consider the following:

3. Methodology

Relevant information was gathered to establish the facts and to support recommendations.

4. Findings of the Investigation:

5. Conclusion:

6. Recommendations

On the basis of the above findings and conclusions, it is recommended that:

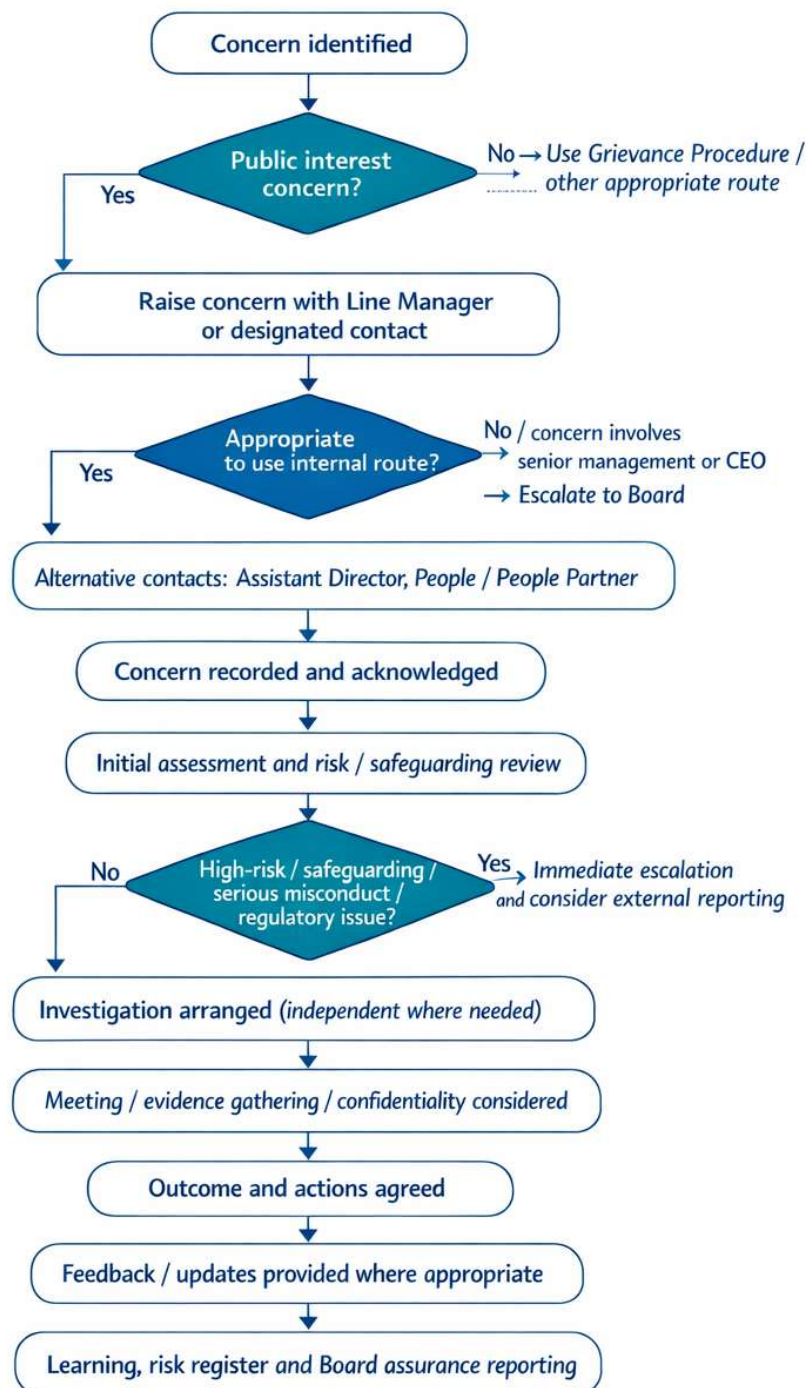
7. Action Plan Development

8. Governance Arrangements for review of action plan

9. Appendices

Appendix Five: Process Flow

Whistleblowing Process Flow



External advice may be sought from Protect or prescribed bodies in exceptional cases.

Appendix Six: Guide at a Glance

What this policy is for To help anyone working for or with the Association raise genuine concerns about wrongdoing, risk, malpractice, or serious misconduct in the public interest. Who can raise a concern Employees, agency workers, contractors, consultants, volunteers, apprentices, student placements, home workers, officers, and others working for or on behalf of the Association. Examples of concerns • Criminal offences or unlawful conduct • Health, safety, safeguarding, or serious wellbeing risks • Financial misconduct, fraud, or misuse of resources • Bullying, harassment, or sexual harassment where there is a wider public interest concern • Concealment of wrongdoing or regulatory breaches When not to use this policy Personal employment issues that only affect you should normally be raised under the Grievance Procedure unless there is a wider public interest concern.	How to raise a concern 1. Raise it with your line manager if appropriate. 2. If not appropriate, contact the People Team routes listed in this policy. 3. You can raise concerns verbally, in writing, or in person. Written disclosures are encouraged. Include where possible • What happened • Why you believe it is true • Relevant dates, locations, and background • Any evidence or witnesses Confidentiality and protection Concerns will be treated confidentially wherever possible. You can raise concerns anonymously, but this may limit investigation and feedback. No one should suffer detriment for raising a genuine concern in good faith. External advice and support Independent advice is available from Protect. Staff can also seek support through Medicash and, where applicable, their Trade Union. Key message If something does not feel right, speak up. Genuine concerns raised in the public interest will be taken seriously and handled fairly.
--	--