



# Whistleblowing Policy






## 1.0 Introduction

- 1.1 Housing Plus Group (“the Group”) is committed to preventing fraud and corruption, such as those examples at 4.3, and to tackle all forms of malpractice and wrongdoing and maintaining the highest standards of integrity, fairness, openness, accountability and probity. That’s why it is important that all serious concerns, risks, and fraudulent activity must be reported, investigated promptly and confidentially and resolved.
- 1.2 As part of this commitment, the Group encourages employees, customers, contractors and the general public who have any concerns about the way in which the Group, or any of its employees, carries out its work, to come forward and express those concerns, as soon as possible. Whistleblowing policy has strong links with other policies such as our Complaints procedure, Safeguarding policy, Disciplinary policy and policies on abuse. In many cases, such concerns will be dealt with through these policies and procedures, such as those for resolving grievances, disciplinary matters, concerns relating to equality or for customers through the Complaints procedure.
- 1.3 It is important that we empower people to highlight concerns. Our officers responsible for these matters will make an informed judgement as to which process is followed on a case-by-case basis. We do realise that employees and others may prefer to express their concern on a confidential basis. A colleague must say straight away if they do not want anyone else to know they have raised a concern. Disclosures made under this Policy will be treated, as far as possible, in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information or the level of investigation required, the reasons will be explained. Colleagues will not have a say in how their concern is dealt with.
- 1.4 The purpose of this policy, as part of the Code of Conduct, is to make it clear that employees and others can report a concern and we will act all matters referred to us whether submitted confidentially or not.

All matters that are brought to our attention or that we become aware of irrespective of which policy they fall under, will be investigated and considered thoroughly in a fair, transparent and timely manner.

## 2.0 Policy Statement

- 2.1 This Policy and the associated procedures are intended to underline the Group’s commitment to its employees / others and its support for those who come forward to genuinely express their concerns. Fraud related disclosures will be prioritised and investigated using appropriate internal controls and, where necessary, the internal or external auditor or regulators. The Policy aims to encourage employees and others to raise concerns at an early stage and in



the right way. All employees have a duty of care and are encouraged to report any issues relating to safeguarding, health and safety or criminal activity and wrongdoing.

- 2.2 The Group will take all concerns seriously and is committed to developing a climate of openness and free expression where raising concerns is welcomed, appreciated and acted upon positively.
- 2.3 No formal disciplinary action will be taken against a colleague if they have raised a concern, even if this is not confirmed by any subsequent investigation, as long as the colleague had a 'reasonable belief' that serious malpractice has taken place or is currently taking place or is likely to take place.
- 2.4 The Whistleblowing Procedure sets out how a concern should be raised and how it will be dealt with.
- 2.5 If a colleague believes a concern was not taken seriously or the wrongdoing is still ongoing they should tell a more senior colleague.


### 3.0 Policy Scope

- 3.1 This policy applies to all operations and includes financial irregularities, fraud, bribery, and concealment and to all individuals associated with the Group. It includes disclosures related to fraud, financial mismanagement, and any attempt to conceal such activities.

### 4.0 Definitions

- 4.1 **Whistleblowing** is a term used when someone who works for an organisation, raises a concern. This could be about possible fraud, illegal activity, bribery, malpractice or another serious risk that could threaten the business, customers, employees, a member or members of the public and/or the reputation of an organisation.
- 4.2 **The Public Interest Disclosure Act 1998** gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure (as detailed in 4.3 below) when they reasonably believe it is in the public interest for them to do so and with the reasonable belief that the information being disclosed is true. Any retaliation against individuals reporting against fraud or those matters listed in 4.3 will result in disciplinary action.
- 4.3 Examples of whistleblowing can be summarised as:

- Where a criminal offence has been, is being or is likely to be committed;
- Where abuse has taken place;
- Where a person has failed, is failing or is likely to fail to comply with

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- any legal obligation;
  - Where a miscarriage of justice has occurred, is occurring or is likely to occur;
  - Where the health and safety of any individual has been, is being or is likely to be endangered;
  - The environment has been or is likely to be damaged;
  - Unauthorised use of company funds, bribery or attempted bribery, money-laundering, fraud and corruption;
  - Where information or circumstances suggests that any one of the preceding matters has been, is being or is likely to be deliberately covered up.
  - From 6 April 2026 reports of Sexual Harassment will become a 'qualifying disclosure' under whistleblowing law.

4.4 The following circumstances are not qualifying disclosures under the Public Interest Disclosure Act 1998 and should be raised via the Grievance or Disciplinary Policy and Procedures as they are not covered by whistleblowing law:

- Personal grievances such as those concerning an individual's terms and conditions of employment or other aspects of a working relationship.
- Complaints by an individual of being bullied, harassed or discriminated against.
- Disciplinary matters.

4.5 **Fraud** – can be summarised as an intentional false representation, including failure to declare information or abuse of position that is carried out to make gain, cause loss or expose another to the risk of loss.

4.6 **Bribery** - can be defined as the offer or acceptance of financial or non-financial benefits with the intent to influence another's conduct / decisions for personal or business gain or advantage.


4.7 **Reasonable belief** - exists where there is a reasonable basis to believe that a crime is being, will be or has already been committed.

4.8 **Qualifying disclosure** – means any disclosure of information that, in the reasonable belief of the employee / other, is made in the public interest.

4.9 **Malpractice** – improper, illegal and / or negligent professional behaviour. Failure to take action or make a report when required to do so.

## 5.0 Roles and Responsibilities

5.1 **Group Board** – has overall responsibility for this policy.



5.2 **Audit & Risk Committee** – has responsibility for reviewing the policy, making recommendations to the Board, and maintaining oversight of risk management and internal control processes

5.3 **Chief Executive** – has a duty to Group employees to ensure they are able to raise genuine concerns where a reasonable and honest suspicion exists without fear of victimisation, recrimination or harassment. In addition, they should ensure there is a strong anti-fraud culture, allocate resources for fraud risk management, and report significant fraud cases to the Board and Regulators.

5.4 **Company Secretary** has responsibility for:

- reviewing the whistleblowing report when it is received and will confirm if the matter comes under the whistleblowing or the grievance procedure.
- Ensure fraud-related disclosures are escalated to the Audit and Risk Committee, and monitor compliance with anti-fraud laws.
- Carry out an internal review of this policy annually or following significant changes in legislation or fraud risk profile.
- Ensuring investigations follow a documented process.

5.5 **Executive Directors and Directors (Leadership Team)** have responsibility for ensuring the organisation operates this policy correctly and within the confines of the law and ensures staff training on fraud awareness and whistleblowing, and support employees who report fraud.

5.6 **Managers** are responsible for ensuring employees are aware of their responsibilities to raise any concern they have and wherever appropriate to discuss these concerns with their line manager in the first instance. They should ensure they act promptly on fraud-related disclosures, maintain confidentiality, and escalate to the Company Secretary.


5.7 **Employees** are responsible for acting in line with the principles of this policy and for reporting any genuine concerns with regards to any wrongdoing, fraud, corruption, malpractice and danger.

## 6.0 Internal reporting

6.1 Any Whistleblowing concerns should be raised in accordance with the Whistleblowing Procedure.


## 7.0 External reporting

7.1 In exceptional circumstances, you might decide it is appropriate to raise your concerns with an external or regulatory agency (a prescribed person or body) such as:

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- The Police
  - The Regulator of Social Housing (RSH) Tel: 0300 124 5225 or email: [enquiries@rsh.gov.uk](mailto:enquiries@rsh.gov.uk)
  - Our Internal Auditor, RSM. Please ask to speak to Louise Tweedie Partner [Louise.Tweedie@rsmuk.com](mailto:Louise.Tweedie@rsmuk.com) Louise does not have any powers to investigate any matters in her role as Internal Audit Partner
  - Our External Auditor, KPMG. Please ask to speak to Sarah Brown, Partner [Sarah.Brown1@KPMG.CO.UK](mailto:Sarah.Brown1@KPMG.CO.UK) Sarah does not have any powers to investigate any matters in her role as External Audit Partner.
  - The Care Quality Commission (CQC) Tel: 0300 0616161 or email [enquiries@cqc.org.uk](mailto:enquiries@cqc.org.uk)
  - The Health and Safety Executive (HSE) Tel: 0300 003 1647

7.2 If you tell a prescribed person or body, it must be one that deals with the issue, such as the RSH in respect of a breach of a regulatory requirement.

7.3 If you need confidential and independent advice on how to raise a concern, you can speak to the whistleblowing charity, Protect on Tel: 020 3117 2520.

	<b>Policy Control Sheet</b> <b>Whistleblowing Policy</b> <b>Policy reference number - 2026/008</b>
<b>Policy Author</b>	Angelina Hicklin Governance Manager
<b>Direct Lead</b>	Suzanne Forster Chief Financial Officer/Company Secretary
<b>Version</b>	V 1.0 – April 2026
<b>Target audience</b>	Employees, Board and Committee Members of the Group.
<b>Consultation</b>	Executive Management Team Leadership Team Employee Forum Trade Union Involved Customers
<b>Date of Equality Impact Assessment</b>	No individuals or groups of people are disadvantaged by the adoption of this policy.
<b>Date of Data Privacy Impact Assessment</b>	Data Privacy Impact Assessment will be completed prior to presenting to the Audit and Risk Committee.
<b>Approving Body</b>	Group Board
<b>Date of final approval</b>	25 <sup>th</sup> March 2026
<b>Implementation date</b>	1 <sup>st</sup> April 2026
<b>Monitoring arrangements</b>	Reports of Whistleblowing will be monitored by the Company Secretary.
<b>Reporting</b>	Audit and Risk Committee via the quarterly Probity report.
<b>Review date</b>	September 2028
<b>Expiry date</b>	March 2029
<b>Review cycle</b>	3-year review cycle
<b>Policy category</b>	Governance
<b>Associated policies and procedures</b>	Safeguarding Policy Anti-Fraud, Bribery, Corruption and Money Laundering Policy Grievance Policy Disciplinary Policy
<b>Policy location</b>	SharePoint Workvivo Housing Plus Group website

#### Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Angelina Hicklin Governance Manager – Wrekin	This policy replaces the two legacy whistleblowing policies and incorporates recommendations made by RSM following the obligation to prevent fraud internal audit.	1.0 – April 2026	Group Board – 15.03.2026