



# **WHISTLEBLOWING POLICY**

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# 1. Policy Statement

- 1.1** Eastlight is committed to maintaining the highest standards of honesty, openness and accountability, recognising that our success depends on the trust of those we work with.
- 1.2** We encourage everyone to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- 1.3** The aim of this Whistleblowing Policy (the ‘Policy’) is to enable and encourage individuals to raise matters of concern that are in the public interest at a high level within the organisation, so that they may be investigated and, where appropriate, acted upon. You will not be at risk of losing your job or suffering any form of retribution as a result of raising a concern about serious malpractice.
- 1.4** This Policy sets out the process for raising a whistleblowing concern and seeks to reassure individuals that it is acceptable and safe for them to raise such concerns without fear of detriment. All disclosures (i.e. the sharing of information relating to potential wrongdoing) will be acted upon promptly, sensitively, fairly and properly, and confidentiality will be respected wherever possible.

# 2. Scope

- 2.1** This Policy applies to all individuals employed by Eastlight and those who are engaged by Eastlight, including apprentices, casual and temporary colleagues, agency workers, self-employed workers, contractors, suppliers and volunteers. The Policy also applies to Board Members and those on Committees.
- 2.2** This Policy is not intended to be used to re-open or review a matter already dealt with under other policies or procedures, or to question or reconsider financial or business decisions taken by Eastlight. The purpose of this Policy is to assist individuals who believe they have discovered serious wrongdoing within the organisation.
- 2.3** This Policy does not form part of a colleague’s contract of employment.
- 2.4** It may be amended at any time.

## 3. What is Whistleblowing?

**3.1** Whistleblowing is the disclosure of information by an individual associated with Eastlight of suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- failure to comply with a legal, professional or regulatory obligation;
- miscarriages of justice;
- dangers to health and safety;
- damages to the environment;
- bribery;
- financial fraud and mismanagement;
- collusion;
- breach of Eastlight’s policies and procedures;
- conduct likely to damage Eastlight’s reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- negligence; or
- the deliberate concealment of any of the above matters.

**3.2** A whistleblower is a person who raises a genuine concern relating to any of the above. If an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of Eastlight’s activities (a whistleblowing concern) it should be reported under this Policy.

**3.3** It is not necessary to have definitive proof that wrongdoing is, has or will be committed in future. In order to encourage early disclosure, a reasonable belief is enough and will trigger formal protection.

**3.4** This Policy should not be used for complaints relating to an individual’s personal circumstances, such as the way you have been treated at work. In those cases, Eastlight’s Grievance Policy should be used if applicable. If you are unsure as to which policy applies, please seek advice from Eastlight’s HR Team.

## 4. Disclosure Procedure

### 4.1 Raising a whistleblowing concern

4.1.2 We hope that in many cases an individual will be able to raise any concerns with their line manager, either in person or in writing. They may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to a Whistleblowing Officer (see Appendix 1).

4.1.3 Where the matter is more serious, or the line manager has not addressed the concern, the concern should be raised with a Whistleblowing Officer. If this is not possible for some reason, concerns can be raised with a member of the HR Team or the Chief Executive.

4.1.4 Wherever possible, concerns should be summarised in writing.

### 4.2 Meeting

4.2.2 If necessary, Eastlight will arrange a meeting with the individual as soon as possible to discuss their concerns. The individual should make every effort to attend the meeting, and they may ask for the meeting to take place off site if preferred.

### 4.3 Investigation and Outcome

4.3.2 In some cases, Eastlight may appoint an investigator or team of investigators, including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. In some cases, an external consultant/ organisation may be used.

4.3.3 The investigator(s) may make recommendations for change to enable the organisation to minimise the risk of future wrongdoing.

4.3.4 Eastlight will, where appropriate, keep the whistleblower informed of the progress of the investigation and, if possible, its likely timescale. Sometimes, the need for confidentiality or other factors may prevent Eastlight from giving specific details of the investigation, the outcome or any disciplinary action taken as a result. This does not, however, mean that the organisation has not dealt with, or is dealing with, the concern appropriately.

4.3.5 If Eastlight concludes that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

## 5. Financial-related Whistleblowing

**5.1** In line with Eastlight’s policy on Anti-Fraud, the Executive Director of Finance, as Eastlight’s accountable officer, must report any material adverse event without delay, such as a significant and immediate threat to the organisation’s financial position, significant fraud (defined as fraud of £5,000 or higher) or impropriety or major accounting breakdown to all of the following:

- Chair of the Group’s Audit and Risk Committee
- Chair of the Group Board
- External auditor
- The Group Chief Executive

## 6. Anonymous Whistleblowing and Confidentiality

**6.1** Eastlight hopes that individuals will feel able to voice whistleblowing concerns openly under this Policy.

**6.2** Eastlight recognises that sometimes whistleblowers might want to remain anonymous. In such cases, whistleblowers should be aware that proper investigation may be more difficult or impossible if Eastlight cannot obtain further information from the whistleblower. It is also more difficult to establish whether any allegations are credible.

**6.3** As far as possible, Eastlight will try to keep whistleblowing concerns confidential and only disclose details on a ‘need to know basis’. Anyone involved in the process will be told that they must keep the information confidential.

**6.4** The whistleblower should also maintain confidentiality, which means they should not discuss their disclosure or Eastlight’s investigation with their colleagues, family or friends without the prior written consent of Eastlight.

## 7. Protection and Support for Whistleblowers

- 7.1** Whistleblowers should not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 7.2** If a whistleblower believes that they have been subjected to any such treatment, they should inform their line manager or the HR team immediately. If the matter is not remedied, it should be raised formally using the Grievance Procedure.
- 7.3** Support can be sought from Eastlight’s Employee Assistance Programme.
- 7.4** An instruction to cover up wrongdoing is a disciplinary offence. If an individual is told not to raise or pursue any concern, even by a senior person in authority, they should immediately report the matter to a Whistleblowing Officer, the Chief Executive, another member of the Executive Management Team or the Senior Independent Director (SID).

## 8. Raising Concerns Externally

- 8.1** The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, whistleblowers should not find it necessary to alert anyone externally.
- 8.2** The law recognises that in some circumstances it may be appropriate for whistleblowers to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Eastlight strongly encourages whistleblowers to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.
- 8.3** Whistleblowing concerns usually relate to the conduct of Eastlight’s staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect a whistleblower if they raise the matter with the third party directly. However, Eastlight encourages whistleblowers to report such concerns internally first, in line with this Policy.

## 9. Monitoring and Review

- 9.1 Eastlight is committed to reviewing this Policy regularly to ensure it meets the legal requirements and reflects best practice.
- 9.2 Eastlight will monitor and report on the effectiveness of this Policy to our Audit and Risk Committee annually, including updates on reported incidents, their nature and the outcomes of investigations. Confidentiality and anonymity will be preserved through this reporting.
- 9.3 Eastlight will provide training to colleagues tasked with investigating whistleblowing concerns within our organisation to ensure they handle concerns effectively.

## APPENDIX 1 – Whistleblowing Officers

The designated Whistleblowing Officers are:

### Role

Executive Director of Strategy, Governance & Assurance  
Executive Director of People & Business Services

### Contact

**joanna.barrett@eastlighthomes.co.uk**  
**sharon.ault@eastlighthomes.co.uk**

In the event that a Whistleblowing Officer is implicated in a concern raised, you should contact the other Whistleblowing Officer. If both officers are implicated, please refer to Section 4.1.3 of the Policy for alternative reporting mechanisms.

Whistleblowing Officers are responsible for:

- Receiving and acknowledging whistleblowing reports;
- Ensuring confidentiality is maintained throughout the process;
- Assessing and determining the appropriate course of action for each report;
- Providing advice and support to individuals raising concerns; and
- Keeping records of all reports and actions taken.

This Appendix will be updated as and when changes to the Whistleblowing Officers occur.

All communications with the Whistleblowing Officers must adhere to the confidentiality requirements outlined in the Policy.



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