Whistleblowing Policy and Speak Up Arrangements

Version Number	2.1
Date Applies From	10/09/2025
Policy Owner	Executive Director of Governance and Assurance
Next Review Date	Sept 2028 (or when substantive legislative changes occur)
Strategy Link	Making the most of our resources

Key connected legislation/regulation:

- Regulator of Social Housing - Governance and Financial Viability Standard
- Governance and Financial Viability Standard Code of Practice
- Public Interest Disclosure Act 1998
- Prevention of Social Housing Fraud Act 2013
- Fraud Act 2006
- Bribery Act 2010
- Housing Act 1985
- Housing Act 1988
- NHF Code of Conduct 2022

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

If you need this information in an alternative language please call

0161 605 7260

For other formats please call

0300 123 5522

Introduction

At ForHousing, we expect high standards of integrity and want to promote an atmosphere of openness and responsiveness where concerns can be raised and resolved. We therefore want to encourage our employees, Board and Committee Members, tenants, and other partners and external stakeholders to feel comfortable raising a concern whenever one arises. In even the best run organisation, things can go wrong, and we rely on these groups of people to let us know so that we can put things right.

The Whistleblowing policy allows staff or external parties to raise concerns about actions or behaviour when, owing to the nature or severity of the issue, it would be inappropriate to use normal channels.

The key aims of this Policy are to:

- Set out ForHousing's obligations in line with the legal framework defining rights and responsibilities related to whistleblowing.
- Detail what to do if you have a concern.
- Specify the action that will be taken by management (both in the investigation of the matter raised and also to ensure that the interests of ForHousing are safeguarded) in order to:
    - promote high standards and behaviours.
    - minimise the instances of poor business practices and/or poor behaviour. enable you, your colleagues, and your customers to feel safe.

Scope of Policy

We are committed to the highest standards of quality, probity, openness, and accountability. We want to positively encourage stakeholders at all levels to express concerns about suspected issues rather than overlooking a problem or raising the issue outside since that could potentially leave us unable to address what may be going on.

There are procedures in place to enable employees to lodge a grievance relating to their own employment. This Whistleblowing Policy or 'Speak Up Arrangement' as it is more commonly known, is intended to cover concerns that fall outside the scope of other procedures. That concern may be about something that:

- is unlawful.
- is against our policies.
- falls below established standards or practices; or
- amounts to improper conduct.

Whistleblowing means reporting malpractice or wrongdoing within an organisation. Malpractice includes:

- a criminal offence.
- negligence.
- breach of the law or Group contractual duties.
- breach of other legal requirements.
- danger to health and safety of any person.
- damage to the environment.

- unethical conduct; and/or
- any attempt to cover up any of the events or practices described above.

Protection is offered for people who speak out against malpractice under the Public Interest Disclosure Act 1988.

The process for raising concerns and the way in which they will be dealt with are contained in the Fraud and Whistleblowing Response Plan. This policy shall apply equally to those complaints or concerns received from both internal and external sources.

If a complaint or a concern is received from an external source consideration will be given to the matter being investigated by and external body to ensure total transparency of process. This will be dependent on the matter outlined in the complaint and will follow an initial examination of the information provided by the responsible officer.

This policy applies to all entities within the ForHousing structure.

The Fraud and Whistleblowing Response Plan

The process for raising concerns disclosures or 'blowing the whistle' on malpractice and the way in which this is dealt with is specified below. There is also a process map available that outlines this process.

Where members of staff and others can do so, they should make the disclosure in writing to the Company Secretary (as the designated officer).

Where that individual is the subject of the disclosure, it should be made to another senior officer or our internal audit providers.

Principles of Handling a Disclosure

- All concerns raised by an individual will be treated fairly and properly.
- Disclosures will be treated in a confidential and sensitive manner and all related material will be stored securely.
- The information produced when handling a disclosure will be kept confidential, limiting access to those people relevant to the investigation. This includes the identity of the individual making a disclosure (where the identity is known).
- Request an investigation of ICT activity logs will be processed via the ForHousing Executive Director of ICT.
- Official written records will be kept at each stage of the whistle blowing investigation process.
- Any individual making a disclosure can retain their anonymity unless they agree otherwise. It must be noted that anonymous concerns carry less credibility, and ForHousing will have discretion in each case whether to continue with an anonymous disclosure. In exercising discretion, consideration will be given to:
    - The seriousness of the issues raised.
    - The degree of credibility of the concern.
    - The likelihood of confirming the allegation from alternative credible sources.
- Disclosures will be investigated as sensitively and quickly as possible.

- ForHousing will not tolerate reprisals against, harassment or victimisation of any individual raising a genuine concern that is in the public interest.
- On receipt of the disclosure (either directly in writing or referral via the Whistleblowing hotline), the designated officer will consider the disclosure and the information made available to him/her and decide whether prima facie (on the face of it) the disclosure falls within the scope of this policy or whether it would be more appropriately considered through another policy.
- The designated officer will issue an acknowledgement of receipt of the disclosure to the individual making the disclosure (where their identity is known).
- Where the disclosure falls within the scope of the Whistleblowing Policy, the designated officer will decide whether to:
    - Appoint someone internal to ForHousing to lead an investigation.
    - Appoint someone external to ForHousing to lead an independent inquiry.
    - Request the internal audit or external auditors to undertake an investigation depending upon the nature and detail of any disclosure, or
    - Refer the matter to the police for investigation.
- Where the matter is to be investigated internally within ForHousing, the investigator will normally be a member of the appropriate entities Management Team independent of the area in which the malpractice or impropriety is alleged to have occurred; and
- Where reasonably practicable the investigation should be completed within 20 working days.

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against the individual.

If an individual makes malicious or vexatious allegations, and particularly if that individual persists in making malicious or vexatious allegations, disciplinary action may be taken against the individual concerned if they are an employee.

In the case of continued vexatious claims made by third parties, ForHousing reserves the right to seek legal redress against person(s) making such claims.

Speak Up Arrangements

Effective communication methods need to exist to allow for employees to report or ‘speak up’ about a potential issue, and to make sure that anyone who does this feels safe and protected.

We have several options which an employee or external source can choose from. These are:

- an internal and external hotline number – 0161 605 7900 **(**all phone calls will be recorded, and an audio file emailed to the Company Secretary);
- an internal and external email address: Whistle.Blowing@forhousing.co.uk;
- a dedicated and confidential Company Secretariat email: company.secretary@forhousing.co.uk; and
- a direct telephone number to the Group’s internal auditors, Beever and Struthers (part of Menzies LLP) on
  smarsh@menzies.co.uk - (0161 838 1807)
  lcartwright@menzies.co.uk - (0161 832 4901)

These arrangements are in place so that we can not only live out our commitment to openness, but also ensure that our employees and stakeholders can raise concerns in good faith, without the potential worry of any perceived communication barriers.

Action Following Investigation

Once an investigation (whether internal or independent inquiry) has been completed, a written report will be submitted to the designated officer who will determine what action, if any, should be taken in the circumstances. This might include invoking other Policies or reference to an external agency as appropriate.

These may include:

- Police.
- HM Revenue and Customs.
- Health and Safety Executive.
- Office of Fair Trading.
- Environment Agency.
- Serious Fraud Office.
- Director of Public Prosecutions.

All matters are reported to the Audit and Risk Committee.

Summary Reporting of Outcomes

The individual who made the disclosure will, where their identity is known, be informed of the outcome of the investigation of the disclosure. If no action is to be taken, the individual will be informed of the reason for this.

Safeguarding Arrangements

We encourage employees and our other stakeholders to report any concerns around suspected abuse. Our Safeguarding Policy and Procedures are in place to help inform our employees if they see anything that they question, and we are confident that our internal reporting for this is working. Employees would only need to “blow the whistle” externally if someone has reported an issue and it is not dealt with.

Alternative Methods of Taking Concerns Forward

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you wish to report a concern to an outside body. If so, we would rather you raised a matter with the appropriate prescribed people and bodies than not at all, the following are possible contact points:

- Local council member
- External audit
- Relevant professional bodies or regulatory organisations
- The Police
- Public Concern at Work on 0207 404 6609 or email: www.pcaw.org.uk

The Government have provided a list of prescribed people and bodies that can be contacted. https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-

bodies--2

If you do take the matter outside ForHousing you need to ensure that you do not disclose confidential information except to those included in the list of prescribed people and bodies.

The law is complex in this area. If there is any doubt about which route to take, it is recommended that the prescribed person, Protect, or your Union be contacted first for initial advice (only disclosing such details as are required to enable them to provide that advice, and on the basis that such disclosures are treated as confidential).

Equity, Diversity, and Inclusion

We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities. We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

Implementation and Communication

The policy will be delivered through the existing governance structure and reviewed every three years the review will ensure that the existing arrangements remain fit for purpose.

Any reported incidents in relation to the breach of this policy will be investigated in line with the fraud investigation process and all investigations will be led by the Company Secretary.

All allegations of whistleblowing will be monitored by the Audit and Risk Committee.

Monitoring, Recording, Reporting

The Company Secretary will monitor the effectiveness and review the implementation of this Policy annually, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures should be subject to regular audits to provide assurance that they are effective in counting bribery and corruption.

All employees are responsible for the success of this Policy.

All allegations of whistleblowing will be monitored by the Audit and Risk Committee.

Related Documents

- Fraud and Whistleblowing Response Plan
- Anti-Fraud, Anti-Corruption and Anti-Bribery Policy
- Safeguarding Policy

Co-production

The policy was developed in consultation with the internal auditors and senior members of staff. It has been approved by the Audit and Risk Committee which is made up of independent members who are not employees of ForHousing or its subsidiaries.

Approval & Review History

With effect from 23/10/2024 the approval route for the Whistleblowing Policy and Speaking Up Arrangements is Executive Management Team - Audit & Risk Committee.

Date	Version	Approved by	Detail
24/10/24	1	Company Secretary	ForHousing templates and language to reflect the collapse of the ForViva Group.
10/09/25	2	Audit & Risk Committee	No material changes, corrections to grammar and update of related document section to reflect current policies. EMT Review 27/08/25.
11/11/25	2.1	N/A	Email addresses updated for Internal Auditors, Beever & Struthers, following their merger with Menzies LLP.