

# Whistleblowing (Confidential Reporting) Policy

|                          |                           |
|--------------------------|---------------------------|
| <b>Department:</b>       | Hopestead                 |
| <b>Policy Owner:</b>     | Chief Executive Hopestead |
| <b>Approved:</b>         | May 2022                  |
| <b>Date for renewal:</b> | May 2025                  |
| <b>Version:</b>          | Version 1.0               |

This policy makes reference to “Flagship Group” as Flagship Housing Group is the sole corporate member of Hopestead and, in addition, the Trustees may, from time to time, and so long as it is in the best interest of Hopestead, share resource with Flagship Group by delegating some of its functions to a team within Flagship Group. The Trustees have decided that it is in the best interest of Hopestead to delegate some functions in relation to this Policy to the Flagship Group Director (Legal & Governance), Flagship Group Governance Team and the Flagship Group Governance Audit and Risk Committee.

## Purpose

To ensure that all employees, volunteers (including agency and temporary workers and trainees and apprentices), agents, consultants, contractors, Trustees and other stakeholders are able to raise, in confidence, matters of serious concern within Hopestead and the wider Flagship Group.

Training on this policy forms part of the induction process for all individuals who work for Hopestead and all Trustees and regular training will be provided as necessary.

## 1. Definition

Whistleblowing is the term used when employees, volunteers, agents, consultants, contractors, Trustees and other stakeholders report serious concerns. The whistleblowing policy can be used to report things that are illegal or if anyone at work is neglecting their duties or wilfully exceeding their duties, including:

- someone's health and safety is in danger
- damage to the environment
- a criminal offence
- the charity or any person isn't obeying the law
- a miscarriage of justice
- covering up wrong doing

Employees, (including agency and temporary workers, trainees and apprentices), volunteers and contractors in particular are often the first to realise that something is seriously wrong, but the last to voice their concerns as they feel that speaking up would be disloyal or may compromise their employment.

Hopestead is committed to ensuring that proper arrangements are in place to enable all members of the Board of Trustees, staff and other individuals to raise serious concerns about propriety or probity in a confidential manner without concerns of breaching confidentiality or fear of reprisals. The Public Interest Disclosure Act 1998 gives full protection to any worker reporting serious concerns if that worker genuinely believes their concerns are true.

Further Government guidance on Whistleblowing is available [here](#).

This policy should be read in conjunction with the Hopestead Code of Business Conduct which sets out the standards of behaviour that employees are expected to meet. All employees of Hopestead and Trustees have a responsibility to read, understand and comply with this policy.

## 2. Reporting

1. Employees can report their concerns to their Line Manager in the first instance, if they are comfortable doing so. If any employee is uncomfortable reporting concerns to their Line Manager, the employee should make the report to any of the people or bodies listed in paragraph 2.4 below. This may be the case, if for example, an employee felt that reporting the concern to their Line Manager could result in a cover up or if there was a genuine fear of reprisals.
2. If applicable, the Grievance policy should be considered prior to resorting to any Whistleblowing action.
3. Trustees must report concerns to the Hopestead Chief Executive or the Flagship Group Director (Legal and Governance) in the first instance.
4. Any individual, including any volunteer, agent, consultant, contractor or other stakeholder, or any employees or Trustees if they do not feel able to use the above steps, can report concerns to:
  - Hopestead Chief Executive – [marie-claire.delbrouque@hopestead.org](mailto:marie-claire.delbrouque@hopestead.org)
  - The Flagship Group Governance Team - [GovernanceTeam@flagship-group.co.uk](mailto:GovernanceTeam@flagship-group.co.uk)
  - Flagship Group Director (Legal and Governance) - [edward.marcus@flagship-group.co.uk](mailto:edward.marcus@flagship-group.co.uk)
  - Flagship Group Chief Executive - [david.mcquade@flagship-group.co.uk](mailto:david.mcquade@flagship-group.co.uk)

- Flagship Group's Internal Auditor – KPMG: [neil.hewitson@kpmg.co.uk](mailto:neil.hewitson@kpmg.co.uk) or [gavin.egmore@kpmg.co.uk](mailto:gavin.egmore@kpmg.co.uk) or [melita.fearnley@kpmg.co.uk](mailto:melita.fearnley@kpmg.co.uk)
- Chair of the Hopestead Board ([Philip.Burton@flagship-group.co.uk](mailto:Philip.Burton@flagship-group.co.uk))

If it is not appropriate to raise confidential concerns with the above-named persons, reports can be made to:

- The Flagship Group Governance, Audit and Risk Committee Chair - [rob.bennett@flagship-group.co.uk](mailto:rob.bennett@flagship-group.co.uk)

Where none of these options are possible, disclosures MAY be made to an external "prescribed body" IF the person disclosing believes that:

- There will be a cover up OR;
- They would be treated unfavourably for disclosing, OR;
- They have already reported the issue internally and it has not been dealt with AND;
- Disclosure is deemed to be in the public interest.

Click [here](#) for a comprehensive list of prescribed bodies. Individuals are encouraged to seek advice before reporting a concern to anyone external.

Protect (an independent whistleblowing charity) operates a confidential helpline. Their contact details are:-

Helpline: 0203 117 2520  
E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
Website: [www.pcaw.co.uk](http://www.pcaw.co.uk)

5. Individuals who are whistleblowing in good faith are guaranteed support and protection from reprisals or victimisation. If any person believes that they have suffered any such treatment, they should inform their Line Manager, Hopestead Chief Executive or the Flagship Group Director (Legal and Governance) or if they do not feel comfortable doing so, any of the contacts listed in paragraph 2.4 above.
6. Concerns can be made verbally, anonymously or in writing, and will be dealt with in confidence where this is possible. Hopestead cannot guarantee anonymity and confidentiality may have to be breached if it is necessary to involve outside agencies, such as the Police.
7. Any employee, volunteer or Trustee whistleblowing may be accompanied to any meeting by a representative of their choice, not acting in a legal capacity.
8. All notifications will be recorded by the Flagship Group Governance Team, on behalf of Hopestead, on the Hopestead whistleblowing register and will be

reported to the Flagship Group Governance, Audit and Risk Committee on a regular basis and to Hopestead Board annually.

### 3. Action

1. The investigation of any whistleblowing reports will be delegated by Hopestead, for the time being, to the Flagship Group Director (Legal and Governance) who will consult as appropriate with the Hopestead Chief Executive, and professional advisors as appropriate and will decide how to investigate each reported incident.
2. Where a concern or complaint is to be treated as whistleblowing, the reasons for doing so will be recorded in writing on the Hopestead whistleblowing register.
3. Investigations will be conducted promptly and objectively by a suitably qualified and resourced senior manager, Flagship Group Internal Audit or an external body (such as the Police) appointed by the Flagship Group Director (Legal and Governance) as necessary and proportionate.
4. The individual raising the concern will be informed of the outcome of the investigation. If an individual is not happy with the way in which their concern has been handled, they can raise it with one of the other key contacts listed in paragraph 2.4 above.
5. All cases of attempted, suspected or actual fraud will be dealt with in accordance with the Anti-Fraud & Bribery Policy.
6. No action will be taken against a person who reports concerns, in good faith, that subsequently transpire to be unfounded.
7. Deliberate abuse, or vexatious or frivolous disclosure by an employee, Trustee, agent, consultant or contractor of Hopestead will be treated as a disciplinary matter.
8. Employees, volunteers and Trustees or any other person must not threaten or retaliate against whistleblowers in any way. If any person is involved in such conduct they may be subject to disciplinary action.

### 4. Review

This policy is updated as required and formally reviewed every three years by the Chief Executive of Hopestead and/ or the Flagship Group Director (Legal and Governance). In addition, it is reviewed annually by the Flagship Group Governance, Audit and Risk Committee.

### Version Control

Note: minor updates increase version number by 0.1; major updates increase version number by 1.0.

| Version | Detail      | Approved by     | Date     |
|---------|-------------|-----------------|----------|
| 1.0     | First issue | Hopestead Board | May 2022 |
|         |             |                 |          |