Plus Dane Housing

Whistleblowing Policy

GOV-POL-02-03

May 2026

Summary

Purpose:

This policy sets out Plus Dane's approach to whistleblowing, ensuring that colleagues, Board and Independent Members, volunteers, contractors, suppliers, customers, and other stakeholders can safely and confidently raise concerns about potential wrongdoing, malpractice, or risks to the public interest.

Audience:

All Plus Dane colleagues (permanent, temporary, agency and secondees)

Board and Independent Members

Volunteers

Contractors, consultants, suppliers and partner organisations

Customers, residents, and service users who may wish to raise concerns relating to wrongdoing affecting Plus Dane

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3	MAR 26	Ciara Gregson	Incorporates improvements arising from the Probity Governance internal audit, including strengthening roles and responsibilities and introducing training expectations for Investigating Managers.
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1. Policy Statement

Plus Dane is committed to maintaining high standards of probity, openness and accountability. This policy encourages colleagues, volunteers, Board and Committee Members, and companies that are providing goods or services to Plus Dane and who have serious concerns about any aspect of its work, to feel confident to come forward and express their concerns without fear of penalty, disadvantage or punishment. This commitment extends to contractors, suppliers and service users. This will allow the matter to be investigated, and action taken rather than a serious matter being overlooked.

Concerns should be raised at the earliest opportunity and to the appropriate person. In most cases, concerns or complaints will be dealt with through Plus Danes normal procedures for resolving grievances or disciplinary matters however the law provides protection, in certain cases, for individuals who raise legitimate concerns about specific matters under the Public Disclosure Act 1998.

This policy sets out how Plus Dane will respond to concerns where the interests of others, or the organisation itself, are at serious risk and making a disclosure is in the public interest.

The policy applies to all Plus Dane colleagues, customers, residents, agency workers, contractors. All other stakeholders are also encouraged to use it.

A comprehensive Whistleblowing Procedure supports this policy. If the concern is in relation to a Board or Committee Member the 'Confidential Concerns Procedure' should be followed.

2. Policy aims

The aim of this policy is to:

- Encourage individuals to feel confident to raise concerns about potential malpractice and wrongdoing – to speak out.
- Provide clear guidance on how concerns can be raised and ensure individuals receive appropriate feedback on any action taken.
- Reassure colleagues and individuals that they will be protected from possible reprisals or victimisation where a concern is raised in the public interest.
- Ensure any reports are thoroughly and fairly investigated.

3. Links to Corporate Plan

This policy directly contributes to each of the four strategic pillars of the Corporate Plan

3.1 Customer Experience

- A strong whistleblowing framework helps ensure customers receive fair, transparent and safe services.
- By enabling concerns to be raised early and without fear, the policy supports high-quality service delivery, reinforces trust, and provides assurance that Plus Dane acts decisively where wrongdoing is suspected.
- It demonstrates Plus Dane's commitment to listening, acting on concerns and maintaining a customer-centred culture.

3.2 Vibrant Communities

- By ensuring concerns about malpractice, safeguarding risks, health and safety issues, or misconduct are raised promptly, the policy helps to maintain safe, well-managed neighbourhoods.
- Whistleblowing plays a role in protecting customers, tackling behaviours that undermine community wellbeing, and ensuring that Plus Dane operates as a responsible landlord within its neighbourhoods.

3.3 Sustainable Organisation

- Whistleblowing arrangements support robust governance, compliance with the Public Interest Disclosure Act 1998, and adherence to the Regulator of Social Housing's Governance and Financial Viability Standard.
- Early reporting of risks or wrongdoing helps protect the organisation's financial resilience and strengthens the overall internal control framework.
- This policy supports a culture of accountability and transparency, contributing to organisational sustainability and effective risk management.

3.4 Colleague Experience

- This policy supports colleagues by promoting an open, supportive culture where concerns can be raised without fear of reprisal.
- It reinforces Plus Dane's values and ensures colleagues understand that they will be protected when acting in the public interest.
- Through clear procedures, training (including investigator training per Audit Action 13) and a commitment to dignity and integrity, the policy enhances confidence and professionalism across the workforce.

4. Key policy definitions

Whistleblowing

Whistleblowing is when someone working within or for Plus Dane raises a concern or passes on information regarding potential wrongdoing or malpractice that could threaten customers, colleagues, the public, or the organisation's integrity or reputation. This is also known legally as "making a disclosure in the public interest."

Disclosure / Protected Disclosure

A disclosure is defined as a concern raised about a risk, danger, wrongdoing, or malpractice. A protected disclosure is one made in the public interest and meeting the conditions set out in the Public Interest Disclosure Act 1998 (PIDA).

To be protected, the individual must reasonably believe the disclosure is in the public interest and that the information disclosed is substantially true.

Malicious or Unfounded Reports

A malicious report is an allegation known to be untrue or made without reasonable belief it is true, often out of spite or for personal gain. Maliciously making a false allegation is a disciplinary matter and may result in formal action.

Grievance (and what is not whistleblowing)

A grievance is a personal complaint about an individual's own employment situation. These should be raised under the Grievance Policy, not whistleblowing. Whistleblowing relates to concerns raised as a witness, not a complainant.

Confidentiality

Plus Dane will take all reasonable steps to protect the identity of anyone raising a concern. In some cases, anonymity cannot be guaranteed if required by law or for due process. Whistleblowers may be asked to provide a statement as part of an investigation.

Victimisation / Detriment

Victimisation means treating someone unfairly because they have raised a whistleblowing concern.

Detrimental treatment may include dismissal, disciplinary action, threats, harassment, unfair treatment, or any action that would discourage someone from speaking out.

Victimising a whistleblower is prohibited and may result in disciplinary action.

5. Roles and responsibilities

The following roles and responsibilities support the effective operation of the Whistleblowing Policy and ensure concerns are managed promptly, fairly and in line with legal and regulatory requirements.

Board

- Provides overall governance and oversight of the whistleblowing framework.
- Ensures Plus Dane maintains effective arrangements for raising and responding to concerns and complies with the Public Interest Disclosure Act 1998.
- Receives annual updates on whistleblowing activity through the Annual Probity Report and regular assurance report.

Audit and Assurance Committee

- Receives quarterly updates on whistleblowing concerns.
- Provides scrutiny over the adequacy of the whistleblowing process and the timely resolution of concerns.
- Considers themes, lessons learned and areas for control improvement arising from whistleblowing cases.
- Considers investigation reports on whistleblowing cases.

Executive Management Team

- Demonstrates organisational commitment to an open and transparent culture where concerns can be raised safely.
- Ensures appropriate resources, systems and procedures are in place to support the operation of this policy.
- Ensures strategic risks, serious disclosures and emerging concerns are escalated promptly through the governance framework.
- Considers final reports on whistleblowing cases.

- Considers if a disclosure is required to the Regulator of Social Housing on receipt of reports of whistleblowing.
- Oversees implementation of any recommendations arising from whistleblowing investigation reports.

Director of Governance and Assurance – Policy Owner

- Acts as the primary recipient for whistleblowing concerns via the dedicated whistleblowing inbox.
- Has oversight of whistleblowing activity and ensures concerns are acknowledged, allocated, investigated and concluded appropriately.
- Ensures serious concerns involving potential financial loss or reputational risk are reported to the Executive Team, Chair of Audit & Assurance Committee and Chair of the Board within two working days.
- Ensures this policy and the supporting Whistleblowing Procedure remain accurate, accessible and reflective of practice, particularly during periods where relevant leadership roles are vacant.

Director of People

- Has access to the whistleblowing inbox to support the receipt and allocation of concerns.
- Works with the Director of Governance and Assurance on concerns involving colleagues, ensuring appropriate liaison with HR and support for individuals.
- Provides advice on matters relating to detriment, confidentiality and fair treatment.

Governance and Assurance Team

- Provides coordination and oversight of whistleblowing activity as part of the wider probity framework.
- Ensures this policy and the supporting Whistleblowing Procedure are maintained and accessible on Intro and updated as required.
- Supports the Director of Governance and Assurance in monitoring themes, control weaknesses and reporting requirements for assurance purposes.
- Contributes whistleblowing metrics and updates to the quarterly Internal Controls Report

Investigating Managers

- Senior Managers allocated by the Director of Governance and Assurance or Chair of Audit & Assurance Committee to investigate concerns in line with the Whistleblowing Procedure.
- Undertake investigations promptly, confidentially and impartially, ensuring findings are evidenced and accurately recorded.
- Attend specific whistleblowing investigator training introduced to support consistency, quality and fairness of investigations.
- Identify and communicate any control weaknesses or lessons learned to the Governance Team.

Line Managers

- Act as the first point of contact where colleagues feel safe raising concerns with their manager.
- Must not attempt to investigate concerns themselves unless authorised to do so.
- Must escalate concerns immediately to the Director of Governance and Assurance or Director of People in accordance with the policy.
- Support colleagues who raise concerns and ensure no detriment occurs.

All Colleagues, Board and Committee Members and Associated Persons

- Are responsible for raising concerns promptly where they identify potential wrongdoing, malpractice or risks to the public interest.
- Must act in good faith and reasonably believe the information disclosed is truthful and in the public interest.
- Must cooperate fully and confidentially with whistleblowing investigations.
- Are protected from detriment, victimisation or retaliation when concerns are raised appropriately under this policy

6. Our approach

Plus Dane is committed to providing clear, safe and trusted routes for raising concerns, ensuring disclosures are handled promptly, sensitively, and in the public interest. Individuals raising concerns will be protected in line with the Public Interest Disclosure Act 1998 and Plus Dane's commitment to openness, accountability and integrity.

6.1 Protected or Qualifying Disclosures

The Public Interest Disclosure Act 1998 (PIDA) is the law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 (ERA).

PIDA makes it unlawful to subject a colleague to negative treatment or to dismiss them because they have raised a whistleblowing concern. Raising a whistleblowing concern is also known as a making a 'protected disclosure' in law.

Whistleblowing rights under PIDA are day one rights. This means that the colleague does not need the same two years' service that is needed for other employment rights.

Under the provision of the PIDA, certain types of disclosure qualify for protection. A qualifying disclosure must demonstrate that it was made in the reasonable belief that it is in the public interest and that:

- A crime has been, is being or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- There is information which tends to show that any of the above points have been, are being or are likely to be deliberately covered up.

- Sexual harassment has occurred, is occurring or is likely to occur

In order for the disclosure to be protected, the individual must show that they reasonably believed that the malpractice falls within the matters for which the person is prescribed and that the information disclosed, and any allegation contained in it, are substantially true.

All complaints of victimisation of an individual for raising a qualifying disclosure will be treated seriously and may provide grounds for disciplinary or other appropriate action.

6.2 What is Not Covered

This policy does not cover matters that are covered by other policies or procedures. These may include:

- Colleague complaints about their employment (which should be raised as a grievance).
- Reports of Fraud and Bribery
- Customer complaints about our services
- Allegations of bullying and harassment

Whilst personal grievances (for example allegations of bullying, harassment, discrimination) are not covered by whistleblowing law, allegations of discrimination against customers or service users, by third party non-employees such as Plus Dane contractors, can be reported under the Whistleblowing Policy.

Similarly, allegations of a Plus Dane colleague discriminating against customers or service users, would constitute a breach of Plus Dane's legal obligations under the Equality Act 2010, so can be reported under the Whistleblowing Policy.

Plus Dane will deal with concerns seriously and will pursue allegations of fraud and abuse through its disciplinary procedures and if necessary, through the legal system. In cases where fraud is suspected, The Anti-Fraud, Bribery and Corruption Policy will be evoked.

6.3 How Concerns Can Be Raised

We urge individuals to come forward with any concerns at an early stage, and before problems have a chance to become serious. If an individual prefers, they can report a concern with support from colleagues, friends, trade unions or an advocate. We will do everything we can to respect confidentiality where this has been requested.

Reports can be made to:

- Line Manager or Senior Manager
- Director of Governance & Assurance or Director of People
- Chair of Audit & Assurance Committee
- Email whistleblowing@plusdane.co.uk
- Telephone 0151 703 2010

When raising a concern, it is not necessary to have proof of wrongdoing, a reasonable belief is sufficient however the following information should be provided where possible:

- The nature of the concern and the key elements, reasons why the concern is being raised.
- Relevant background information, including dates/times along with any evidence, where appropriate.
- Who was involved including names and details.
- Location if appropriate.
- Why you feel it is a protected disclosure.
- If a concern has been raised before, any response received.
- Contact details and information.
- Any information or supporting evidence.

Whistleblowing requires disclosing specific, factual information about wrongdoing—not allegations or complaints—to gain legal protection.

Concerns which are raised with the Chair of Audit and Assurance Committee may be allocated to a senior manager to investigate, and they may seek advice from the Internal Auditors. All allocated individuals have received the appropriate training to deal with and give advice about whistleblowing concerns. This includes training in interview techniques and how to handle the received evidence.

We will support concerned individuals and protect them from reprisals or victimisation. This applies equally if you come forward with reasonable belief with a concern which turns out later not have been justified.

If anyone tries to discourage a reporting of concerns, we will treat this as a disciplinary matter. In the same way, we will take appropriate actions against anyone who criticises individuals after a concern has been expressed.

There is a liability for Plus Dane if we fail to take reasonable steps to prevent the harassment or victimisation of whistle-blowers by their colleagues. In addition to this, colleagues can also be personally liable if they subject a whistleblower to a detriment.

Detrimental treatment includes dismissal, disciplinary actions, threats, harassment, victimisation and any other unfavourable treatment. Action will be taken to protect individuals in these circumstances.

An instruction to cover up a wrongdoing is also a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent, they should report the matter and speak out.

Plus Dane will do its best to protect an individual's identity when a concern is raised unless there is a requirement in law to make this known. The whistleblowing investigation may reveal the source of the information and a statement by the individual may be required as part of the evidence.

If a concern is raised anonymously then it is likely to be more difficult to investigate. If an individual wants to remain anonymous, this should be stated explicitly at the outset of the report. Concerns raised anonymously will still be considered at the discretion of Plus Dane dependent on the seriousness of the allegation and the

credibility of the concern. The Director of Governance & Assurance and the Director of People retain ultimate discretion on this point.

6.4 Seeking Independent Advice

We encourage individuals to address any concerns using internal procedures in the first instance. Should internal procedures not satisfy the concerns, an individual may consider making a disclosure to a regulator, prescribed person or other external body.

If a concern is raised with an external organisation, it is important that the correct organisation for the issue is contacted. There may be specific or additional requirements which must be met in order to qualify for protection under the Public Interest Disclosure Act. A government publication lists all the prescribed people and bodies to whom a disclosure can be made.

Protect (formerly PCaW) is an independent charity that offers a free, confidential helpline and can advise individuals on how to safely and effectively raise a concern. Contact details are:

Protect

- Call 020 3117 2520
- Email whistle@protect-advice.org.uk
- Visit www.pcaw.org.uk

6.5 What Happens with a Disclosure / Report

Any matter disclosed under this policy will be investigated thoroughly, promptly and confidentially and the outcome of the investigation will be reported back to the individual who raised the issue where possible.

Any investigation conducted as a result of whistleblowing may reveal the source of the information and a statement by the individual may be required as part of the evidence. Individuals are encouraged to give their name when allegations are made.

All serious disclosures where significant loss or reputational risk is suspected will be reported to the Executive Team, Chair of Audit & Assurance Committee and Chair of the Board within 48 hours of receipt.

The investigation manager will report their findings and appropriate recommendations to the person to whom the disclosure was made, normally within 28 days of the final meeting. This report will be considered by the Executive and Audit & Assurance Committee.

If the report is about an individual, the person(s) against whom a disclosure is made will be notified at the earliest opportunity and provided with any supporting evidence. The individual will be allowed to respond to the allegation.

Depending on circumstances, the individual making the disclosure may be informed if further action is to be taken. However, where referral to an external authority is required, it may not be possible to inform the individual who has made the disclosure. A written record will be kept at each stage of the process.

Plus Dane encourage reporting as it ensures that we learn when things go wrong or have the potential to go wrong. The outcomes and learning from an investigation will

consider whether any processes and procedures require amending, whether additional support or training is required and what changes can be made to reduce a recurrence of the issues.

6.6 Process and timescales

The steps below summarise how Plus Dane will manage a whistleblowing disclosure. Timescales are indicative and may be extended where necessary (for example, due to complexity, availability of witnesses, or parallel external investigations). Where an extension is needed, the individual who raised the concern will be updated where possible.

1. **Receipt and acknowledgement**: the concern is logged and acknowledged as soon as practicable, normally within **2 working days** where contact details are available.
2. **Triage and safeguarding / immediate risk actions**: an initial assessment is completed to determine urgency, any safeguarding or health and safety actions, and whether any immediate steps are needed to preserve evidence.
3. **Allocation and conflict check**: an Investigating Manager is appointed and any conflicts of interest are considered. Where the concern relates to senior individuals, alternative arrangements will be agreed (including escalation to the Chair of Audit & Assurance Committee where appropriate).
4. **Escalation of serious concerns**: disclosures involving significant loss or reputational risk are escalated to the Executive Team, Chair of Audit & Assurance Committee and Chair of the Board within **48 hours** of receipt.
5. **Investigation plan**: the Investigating Manager sets out the scope, approach, information required, and an indicative timetable; this will include identifying relevant witnesses and documents and considering whether other procedures (e.g. safeguarding, HR, fraud) also apply.
6. **Investigation and evidence gathering**: interviews and document review are completed promptly and confidentially. A written record is kept at each stage.
7. **Investigation report**: the Investigating Manager submits findings and recommendations to the person to whom the disclosure was made, normally within **28 days of the final investigation meeting**.
8. **Decision-making and actions**: reports are considered by the Executive and the Audit & Assurance Committee (as appropriate). Actions may include control improvements, disciplinary action, process changes, training, or external referral.
9. **Feedback and closure**: where possible, the individual who raised the concern will be informed that the matter has been considered and whether action is being taken, recognising that confidentiality and data protection may limit the detail that can be shared.
10. **Learning and monitoring**: themes and lessons learned are captured, tracked to completion, and reported through the governance framework.

All disclosures and investigation records will be retained in line with Plus Dane's records management arrangements. Updates will be provided during the process where possible and appropriate.

6.7 Unfounded or Malicious Reports

A malicious report can be an allegation which is known to be untrue, not having reasonable belief that it is true, made out of spite or for personal gain.

If a colleague raises malicious or unfounded concerns, this will be taken seriously. Maliciously making a false allegation is a disciplinary matter and the individual will be subject to disciplinary proceedings. All concerns are dealt with seriously and allegations of fraud and abuse will be pursued through disciplinary procedures and if necessary, through the legal system.

7. Assurance

Plus Dane will maintain strong assurance arrangements to ensure the Whistleblowing Policy operates effectively, concerns are handled consistently, and learning is embedded across the organisation. These arrangements form a key part of Plus Dane's wider probity and internal control framework.

7.1 Oversight and Monitoring

- All whistleblowing concerns are logged, monitored and overseen by the Director of Governance and Assurance and the Director of People, with support from the Governance Team.
- Serious disclosures involving potential financial loss or significant reputational risk will be reported to the Executive Team, Chair of Audit & Assurance Committee and Chair of the Board within 48 hours of receipt.
- Themes, lessons learned and completed investigations feed directly into improvements in internal controls, policy updates and future training.

7.2 Reporting

The following information will be reported through the Internal Controls Report to the Audit and Assurance Committee each quarter.

- Number of whistleblowing concerns raised in the period
- Summary of themes, case types and emerging issues
- Progress updates on ongoing reviews
- Any cases of detriment or victimisation (if identified)
- Cross-reference to other probity indicators (fraud cases, conflicts of interest, disciplinary issues) for assurance alignment

An annual summary of whistleblowing activity will be included in the Annual Probity Report to the Board including:

- Total number and nature of concerns raised
- Outcomes, themes and organisational learning
- Control improvements implemented as a result
- Training and awareness activity undertaken

7.3 Lines of Defence

First line – Operational Management	Second line – Governance and Assurance	Third line – Internal / External Audit
Identify and manage risks; ensure concerns raised to them are escalated promptly and not investigated locally unless instructed. Maintain a supportive environment for speaking out.	Oversight of whistleblowing activity, policy maintenance, monitoring themes and escalation, ensuring timely and proportionate investigations, and reporting to EMT and Committee.	Periodically review the effectiveness of whistleblowing processes and the internal control environment, providing independent challenge and assurance.

8. Equality Impact Assessment

An equality impact assessment has considered the elements within Whistleblowing Policy to ensure that there are no barriers on its application. The supporting procedures set out how concerns can be raised.

9. Modern slavery & human trafficking

Plus Dane is committed to preventing modern slavery and human trafficking in all its forms. Whistleblowing plays an essential role in enabling colleagues, customers and stakeholders to report concerns about criminal activity, exploitation or malpractice that may indicate modern slavery or related harm.

The Whistleblowing Policy supports this commitment by:

- Providing safe, confidential routes for reporting concerns where exploitation, trafficking or coercion may be suspected.
- Ensuring concerns are raised early, enabling prompt safeguarding action and appropriate escalation.
- Ensuring individuals raising concerns are protected from victimisation or detriment.
- Supporting Plus Dane's wider probity and safeguarding framework, which requires colleagues to identify and respond to potential indicators of criminal exploitation.

Where concerns relate to potential modern slavery or human trafficking, colleagues must:

- Raise the concern immediately via the whistleblowing routes or via safeguarding procedures where appropriate.
- Ensure they do **not** place themselves or others at risk when raising concerns.
- Follow the organisation's **Safeguarding Procedure** for cases where an individual may be at risk of harm or exploitation.

Plus Dane will work in partnership with safeguarding agencies, local authorities, the police and other relevant bodies where referrals or further investigation are required.

10. Data Protection Impact Assessment

A DPIA is not required as no new data-processing risks were identified.

11. Legislative and regulatory considerations

The Whistleblowing Policy has been developed to ensure Plus Dane complies with all relevant legislation and regulatory standards that govern the raising, handling and protection of whistleblowing concerns. The policy supports the organisation's commitment to transparency, accountability and good governance.

The following legislation and regulatory requirements directly inform this policy:

11.1 Public Interest Disclosure Act 1998 (PIDA)

This Act provides the legal framework for whistleblowing in the UK, including:

- Protection from dismissal or detriment for individuals who make *protected disclosures* in the public interest.
- Criteria defining what constitutes a qualifying disclosure (e.g., crime, legal breaches, risk to health or safety, environmental damage, concealment of wrongdoing).
- Requirements for disclosures to be made to prescribed persons or appropriate internal channels.

11.2 Employment Rights Act 1996 (as amended by PIDA and the Employment Rights Act 2025)

- Provides additional employment protections for whistleblowers, including day-one rights (no qualifying service required).
- Outlines the legal remedies available where an individual suffers detriment after raising a protected disclosure.
- Explicit and standalone category of "qualifying disclosure" for whistleblowing purposes.

11.3 Regulator of Social Housing — Governance and Financial Viability Standard

Plus Dane must maintain effective internal control and assurance arrangements, including appropriate reporting mechanisms for wrongdoing and probity matters.

This policy supports the requirement for registered providers to act with integrity, maintain strong governance and demonstrate transparency to tenants and stakeholders.

Depending on the nature of the report, the Executive may disclose the report and its outcome to the regulator.

11.4 Regulator of Social Housing — Consumer Standards (2024)

The updated Consumer Standards emphasise:

- Ensuring customers are treated fairly and safely.
- Maintaining clear mechanisms for reporting concerns.
- Acting swiftly where risks to customers or neighbourhoods are identified.
- Whistleblowing forms part of the broader framework supporting these duties

12. Links to other Plus Dane policies

- Anti-Fraud, Bribery & Corruption Policy

- Anti-Money Laundering Policy
- Conflicts of Interest Policy
- Disciplinary Policy
- Grievance Policy