

BELGRAVE NEIGHBOURHOOD CO-OPERATIVE HOUSING ASSOCIATION WHISTLEBLOWING POLICY

Aims of the whistleblowing policy

The following are aims of the whistleblowing policy:

- To ensure that BNCHA maintains high standards of conduct in all that it does
- To ensure that members, committee members and staff members of organisations working with BNCHA know what to do if they come across something that they think is fundamentally wrong, illegal or endangers others with BNCHA or the public
- To give guidance to stakeholders on how to raise a concern or “blow the whistle”

Delegated Authority

- 1 The co-op delegates the Chief Executive Officer to manage whistleblowing allegations.

Policy principles

- 2 It is important that the whistle blowing procedure is followed when raising any concerns, to ensure that the matter is dealt with correctly. Where a concern is properly raised under this procedure, the individual will be protected from any unfair or negative treatment.
- 3 The policy refers to stakeholders as those that may wish to “whistleblow”. Stakeholders can include:
 - BNCHA committee members
 - BNCHA staff members
 - Staff members of other organisations with whom BNCHA has a relationship.
- 4 The following principles underpin this policy:
 - stakeholders are encouraged to raise any concerns they may have about wrongdoing as soon as they notice it;

- stakeholders raising a concern will be afforded protection as detailed in this policy;
 - all genuine concerns will be handled responsibly, professionally and in a positive manner; and
 - help and support will be available to stakeholders where genuine concerns are raised under the Whistleblowing Policy.
- 5 If a stakeholder has any queries about this policy, they should contact the BNCHA Chief Executive Officer.

Staff and whistleblowing

- 6 Staff should use the Whistleblowing Policy where they are asked by individual committee members to carry out actions that are against BNCHA policy or which have not been approved by the committee.
- 7 Staff should not:
- make payments from the BNCHA bank accounts that are not in accordance with BNCHA's Financial Standing Orders and other BNCHA policies, unless out of policy decisions have been made at a BNCHA committee meeting held in accordance with BNCHA's rules
 - authorise repairs or other management actions unless they are in accordance with BNCHA policies or have been agreed at a BNCHA committee meeting held in accordance with BNCHA's rules.
- 8 If a staff member considers that a committee member is, or is seeking to, commit fraud or some other serious misdemeanour, BNCHA expects them to consider that they have a duty to take such appropriate action to prevent such fraud or misdemeanour taking place or to report it if it does take place. Where appropriate, the actions the staff member may take can include reporting matters to the Regulator of Social Housing, to the Police or to some other public body.
- 9 Where possible, the staff member should endeavour to report any actions it takes the next meeting of the committee.

Procedure

- 10 If a stakeholder is asked to do something, or is aware of the actions of another, which they consider to be wrongdoing, they can raise the matter using this procedure. The stakeholder must have a reasonable belief that raising the concern is in the public or BNCHA's interest.
- 11 Stakeholders who raise concerns with a reasonable belief that raising the concern is in the public or BNCHA's interest, will be given protection under this procedure.
- 12 Action may be taken against stakeholders who raise concerns acting in bad faith or who raise malicious, vexatious or knowingly untrue concerns.
- 13 This procedure should not be used to raise concerns of a personal nature, for example, complaints relating to a management decision or governance decisions that a person disagrees with (unless they exhibit wrongdoing by those making the decisions).
- 14 If a stakeholder experiences something relating to BNCHA which they perceive to be a wrongdoing, it is important that the concern is raised straight away. Proof is not required. BNCHA will investigate the matter and seek proof dependent on the issue raised. The stakeholder must, however, have a reasonable belief that disclosing the information is in the public or BNCHA's interest before raising a concern.
- 15 All whistleblowing concerns should be raised with BNCHA's Chief Officer.
- 16 When raising a concern under the procedure, a stakeholder should try to provide the following information:
 - the background and reason behind the concern;
 - whether they have already raised a concern with anyone and the response; and
 - any relevant dates
 - any personal interests in the matter.

- 17 The Chief Officer will ensure that all investigations are conducted sensitively and as quickly as possible. The matter should be handled fairly and in accordance with this procedure and other BNCHA policies.
- 18 BNCHA will respect any request for confidentiality as far as possible, restricting it to a need to know basis. However, if the situation arises where it is not possible to resolve the concern without revealing the stakeholders's identity, BNCHA will advise the stakeholder before proceeding.
- 19 Stakeholders may choose to raise concerns anonymously. If this is the case, the investigation itself may serve to reveal the source of information. Stakeholders are therefore encouraged, where possible to put their names to concerns raised. However, raising a concern anonymously is preferred to silence about potential serious wrongdoing. When anonymous concerns are raised they will be treated as credible, unless they are obviously a hoax, and investigated so far as possible.

External disclosures

- 20 Whistleblowing concerns should normally be raised with the Chief Officer and it is anticipated that the Chief Officer should be able to resolve matters of genuine concern appropriately.
- 21 Raising a concern outside BNCHA, such as through the media, the Regulator for Social Housing, campaign groups, on social media or with political parties, may result in action being taken against the stakeholder.
- 22 However, it is recognised that the Chief Executive Officer and other staff members may have a duty to report some whistleblowing concerns to the Regulator of Social Housing, the Police or to some other public body, and it is not the intention of this policy to restrict such disclosures.

Risks to be avoided:

- A stakeholder may not report genuine matters of concern out of fear that they will be penalised from doing so
- A stakeholder may seek to use the Whistleblowing Policy for their own ends
- The Chief Executive Officer or staff members may feel constrained to not fulfil their duty to report matters to the Regulator of Social Housing, to the Police or to other public bodies when there is a need for them to do so.