

# Whistleblowing Policy

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|-----------------------------|------------------------------------------------------------------------|-----------------------|-----------------|
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| <b>Audience</b>             | All CIH employees, trustees, contractors and volunteers (colleagues)   | <b>Approval date:</b> | July 2026       |
| <b>Date effective from:</b> | July 2026                                                              | <b>Review date:</b>   | Oct 2028        |

## 1. Aim

The Chartered Institute of Housing (CIH) is committed to the highest standards of openness, probity and accountability and wants to encourage employees, trustees, contractors and volunteers (collectively referred to as colleagues) to raise issues which concern them at work.

It is important to the business that any fraud, misconduct or wrongdoing by colleagues of CIH is reported and properly dealt with.

## 2. Principles

The Public Interest Disclosure Act 1998 ("the Act") gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns, provided the disclosure is made in accordance with the procedures identified in the Act and in good faith.

CIH encourages a free and open culture between its colleagues and all people with whom it engages in business. In particular, CIH recognises that effective and honest communication is essential if concerns about breaches or failures are to be dealt with effectively and CIH's success ensured.

This policy is designed to provide guidance to colleagues who work with the organisation who may feel that they need to raise an issue relating to the organisation with someone in confidence.

Colleagues who raise genuine concerns under this policy in the public interest will not, under any circumstances, be subjected to any form of detriment or disadvantage as a result of having raised concerns.

A colleague who makes a disclosure is protected from detrimental treatment by CIH, by a co-worker or by any representative of the organisation. CH would be vicariously liable for any detrimental treatment. If this occurs, it should be raised immediately with colleague's line manager so that this can be investigated thoroughly without delay. Detrimental treatment includes harassment and bullying or not complying with a person's rights and entitlements under their contract of employment.

### 3. Definitions

A qualifying disclosure is one made in good faith by any colleague who has a reasonable belief that one of the following is being, has been, or is likely to be, committed and that it is in the public interest for the individual to disclose it.:

- a criminal offence
- a miscarriage of justice
- a breach of health and safety rules causing danger to any individual
- causing damage to the environment
- sexual harassment occurring or likely to occur.
- a breach of any other legal obligation; or
- concealment of any of the above

It is not necessary for the colleague to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The colleague has no responsibility for investigating the matter - it is CIH's responsibility to ensure that an investigation takes place.

### 4. Guarantee

CIH is committed to this policy. If a colleague raises a genuine concern under this policy, they will not be at risk of losing their role or suffering any form of retribution, victimisation or detriment as a result.

CIH will treat any disclosure seriously and act according to this policy.

Colleagues will be given feedback on any investigation, and the organisation will be sensitive to any concerns they may have as a result of any steps taken under this procedure.

### 5. Arrangements

This policy sets out arrangements for colleagues to raise serious concerns about malpractice or serious wrongdoing in ways which will protect them from reprisal. By knowing about malpractice at an early stage, CIH stands a good chance of taking the necessary steps to safeguard the interests of all colleagues and protect the organisation.

Colleagues aggrieved about their own personal circumstances should use the normal Grievance Procedure. The procedure outlined in this policy should be used only where colleagues have concerns about malpractice within the organisation.

#### **HOW TO RAISE A CONCERN INTERNALLY**

If a colleague has a concern about serious wrongdoing, they should normally raise the issue first with their line manager. This may be done orally or in writing.

If a colleague feels unable to raise the matter with their immediate superior, for whatever reason, they should raise the matter with either the HR Manager or a Member of the Executive team.

If these channels have been followed and the colleague still has concerns, or if they feel that the matter is so serious that they cannot discuss it with any of the above, they should raise the matter with the CEO or the Company secretary.

If a colleague reasonably believes that the relevant failure (i.e. one of the set of circumstances listed in the definitions above) relates wholly or mainly to the conduct of a person other than someone who works for CIH, then they should make that disclosure to that individual's employer.

### **HOW TO RAISE A CONCERN EXTERNALLY**

It is intended that this policy should be used to give colleagues the opportunity and protection they need to raise their concerns internally. However, in exceptional circumstances, if an individual feels they cannot raise their concerns internally and they honestly and reasonably believe the information and any allegations are true, they should consider raising the matter with an appropriate external party, which could include Board

### **HOW CIH WILL HANDLE THE MATTER**

Once a concern has been raised, CIH will initially assess what action should be taken in a responsible and appropriate manner. Insofar as is possible, CIH will treat the matter in confidence. This will usually involve making internal enquiries first, but it is likely that an investigation will be necessary and the colleague who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the colleague's working relationships are not prejudiced by making the disclosure.

CIH will tell the investigating officer, how they can contact the whistleblower. As far as possible, CIH will keep the whistleblower informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, CIH will not be able to inform the whistleblower of any matters which would infringe the duty of confidentiality owed to others.

While CIH hopes that such disclosures will never be necessary, it also recognises that circumstances may arise with which we are unfamiliar. Each case will be treated based on its own facts.

CIH therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns they have and how those concerns will be dealt with:

- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the colleague who raised the issue.
- No-one will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the colleague will not be prejudiced because they have raised a legitimate concern.
- Victimisation of any colleague for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure, CIH's disciplinary policy will be used for employees, in addition to any appropriate external measures.
- Maliciously, or for personal gain, making a false allegation is also a disciplinary offence and may constitute gross misconduct for which dismissal is a possible sanction.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to a director or the CEO.

This policy encourages colleagues to put their name to any disclosures they make. Concerns expressed anonymously are much less powerful, but they will be considered.

## 6. Review

This policy will be reviewed every 3 years in line with the schedule.